



CLEAN SITES INC

1199 NORTH FAIRFAX STREET / ALEXANDRIA VIRGINIA 22314 / 703-688-8520

Site:	<u>Rose, Martha</u>
ID#:	<u>MOD980633069</u>
Break:	<u>10-9</u>
Date:	<u>11-21-86</u>
	<u>078D</u>

November 21, 1986

Mr. George Hess
U.S. EPA
Region VII
25 Funston Road
Kansas City, KS 66115

SUBJECT: Project Progress Report #1
Rose Chemicals Site

Dear George:

Progress Report No. 1 for the Rose Chemicals site at Holden, Missouri is attached. This report covers progress from October 19 through November 14. In the future, progress reports will be issued twice a month with the next one issued for progress up to the end of November.

Very truly yours,

Clifford W. Kline

Clifford W. Kline
CSI Project Manager

WPL/sjr



40024253
SUPERFUND RECORDS

ROSE:reports/epa_prgrsrpt1

CHAIRMAN OF THE BOARD/Russell E. Train PRESIDENT/Charles W. Powers BOARD OF DIRECTORS/Peter A.A. Berle,
Douglas M. Costle, Louis Fernandez, Sandra S. Gardebring, Edwin A. Gee, Jay D. Hair, Donald Kennedy, Joshua Lederberg,
H. Eugene McBrayer, Charles W. Powers, William K. Reilly, Henry B. Schacht

PROJECT PROGRESS REPORT NO 1

ROSE CHEMICALS SITE CLEANUP

STATUS FOR PERIOD 10/18/86 - 11/14/86

EXECUTIVE SUMMARY

- o The Administrative Order on Consent (AOC) between the EPA and the PRPs was executed on November 12.
- o Chemical Waste Management (CWM), the contractor selected for the work ordered by the AOC, arrived at Holden on November 3.
- o 100+ drums of sodium were opened and inspected.
- o 100+ drums of potentially hazardous liquids were opened and samples taken.
- o A trench was dug around the perimeter of the main building and the two sewer connections found were plugged.
- o Work plans to guide the completion of activities required by the Statement of Work (SOW) are being developed and will be submitted to the EPA for approval and/or comment on December 3.

ADMINISTRATIVE ORDER ON CONSENT

The Administrative Order on Consent (AOC) between the EPA and the PRPs was executed on November 12. Included in the AOC was the approved Statement of Work (SOW) which is the basis for the scope of work to be completed by Chemical Waste Management (CWM) under the terms of the contract with CSI. The formal signing of this contract is planned for the week of November 17.

SITE MOBILIZATION

Chemical Waste Management (CWM) moved on site November 3 to begin the work to be done as outlined in the Letter of Intent - Work Authorization No. 1 dated September 29. Tasks authorized under the Letter of Intent were: (1) completion of work plans, (2) assistance to CSI in the development of the site security/emergency plan, (3) disposal of acutely hazardous materials, and (4) sampling and analysis to confirm mobilization plan.

Presently, there are five CWM people working on site.

DISPOSAL OF SODIUM AND HAZAROUS CHEMICALS

Most of the approximately 100 "empty" sodium drums were opened and inspected. All contained residual sodium. None of these sodium drums will be cleaned and crushed on site. All will be shipped "as is" to an incinerator for disposal by burning.

The approximately 100 drums of potentially hazardous liquids have been sampled and the samples submitted for analysis at Langston Laboratories. Results are expected during the week of November 17.

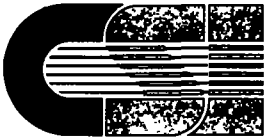
SITE SECURITY

A trench has been dug around the perimeter of the building to find sewer drain connections leaving the buildings. One 8" clay tile and one 6" cast iron line were found and plugged. This activity was done as a necessary precaution to prevent any PCB contaminated drainage getting into the Holden POTW after the one time cleanup of the sludge drying pits.

A contract has been let to replace the roll-up overhead door at the entrance to the American Steel crane bay area where the sodium drums and the drums of potentially hazardous liquids are stored. The old door could not be raised or lowered safely.

SOW WORK PLANS

Work plans to guide completion of the activities required by the SOW are being developed and will be submitted to the EPA for approval and/or comment on December 3. Included in these plans will be a site specific Health and Safety Plan, a Quality Assurance/Quality Control Plan, a Sampling/Analysis Plan, an Inventory Plan and a Spill Prevention Control and Countermeasure Plan.



CLEAN SITES INC

1199 NORTH FAIRFAX STREET / ALEXANDRIA VIRGINIA 22314 / 703-683-8522

December 8, 1986

Mr. George Hess
U.S. EPA
Region VII
25 Funston Road
Kansas City, KS 66115

SUBJECT: Project Progress Report #2
Rose Chemicals Site

Dear George:

Progress Report No. 2 for the Rose Chemicals site at Holden, Missouri is attached. This report covers progress from November 15 through November 30.

Very truly yours,

Clifford W. Kline

Clifford W. Kline
CSI Project Manager

WPL/sjr

ROSE:reports/epa_prog_rpt2

CHAIRMAN OF THE BOARD/Russell E. Train PRESIDENT/Charles W. Powers³ BOARD OF DIRECTORS/Peter A.A. Berle,
Douglas M. Costle, Louis Fernandez, Sandra S. Gardebring, Edwin A. Gee, Jay D. Hair, Donald Kennedy, Joshua Lederberg,
H. Eugene McBrayer, Charles W. Powers, William K. Reilly, Henry B. Schacht

PROJECT PROGRESS REPORT NO 2

ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR PERIOD 11/15 Through 11/30/86

HIGHLIGHTS

- o 435 transformers have been inventoried. Transformer inventory should be completed by December 12, 1986.
- o Wet sludge in two drying pits and the truck loading pit has been stabilized. The City of Holden has submitted a Special Waste Disposal Request to the Missouri Department of Natural Resources.
- o Channel 4 News, NBC, Kansas City, MO. did a news story on the signing of the AOC. The report was positive and favorable to the PRP work underway.
- o Chemical Waste Management has increased the work force to eight people. Monthly cost data spreadsheets are now being generated.
- o Work Plans are being developed and will be completed for delivery to the U.S. EPA December 10, 1986.

ROSE CHEMICAL SITE DETAILED INVENTORY

A detailed inventory of all the transformers stored in the Rose Chemical Site warehouse has been started. To date 435 transformers have been inventoried using a manual data input with a data sheet for each transformer. A sequential number, T-XXXX, is assigned to each transformer, marked on the transformer and data sheet for further identification. The following information is recorded on the data sheet for each transformer.

- Owner of transformer when shipped to Rose Chemicals Co.
- Date shipped shown on shipping sticker.
- Transformer manufacturer
- Serial number

- Oil capacity
- Oil type
- Maximum dimensions; length, width, height.

It is anticipated the transformer inventory will be completed by December 12, 1986.

WASTE SLUDGE DISPOSAL

The wet sludge in the two drying pits and the truck loading pit has been mixed with dry cement kiln dust. The resulting final stabilized mixture is quite dry and will be easy to haul and landfill. The waste sludge in the spirogester and final clarifier cannot be stabilized until the truck loading pit is emptied.

A Missouri Department of Natural Resources Special Waste Disposal Request has been prepared, signed, and submitted by Mayor Francis Brillhart, City of Holden, to the DNR. When Missouri DNR approval is received, the stabilized sludge will be placed in a sanitary waste disposal landfill.

MEDIA RELATIONS

Channel 4 News, NBC, Kansas City, MO. visited Holden on November 13, 1986 after EPA Region VII issued a news release about the signing of the AOC for Phase I. Channel 4 interviewed Cliff Kline, the Project Manager at Holden, EPA officials in Kansas City and did spot interviews with several Holden residents. The story was shown on the 6 P.M. and 11 P.M. newscast November 14, 1986. The story was positive and favorable to the work underway. EPA officials commented that the cleanup has just begun and could take 18 months to 2 years to complete. Debbie Dalton, CSI Alexandria, has a video recording of the story.

MOBILIZATION

Chemical Waste Management (CWM) has increased the on-site work crew by two people for a total of eight. One of the new people is Richard Grant, Project Accountant, who will be responsible for the inventory data input and report generation. Currently an onsite computer is being used to run financial spreadsheets and preliminary transformer inventory data reports.



CLEAN SITES INC

1199 NORTH FAIRFAX STREET / ALEXANDRIA VIRGINIA 22314 / 703-683-8522

December 22, 1986

Mr. George Hess
U.S. EPA
Region VII
25 Funston Road
Kansas City, KS 66115

SUBJECT: Project Progress Report #3
Rose Chemicals Site

Dear George:

Progress Report No. 3 for the Rose Chemicals site at Holden, Missouri is attached. This report covers progress from December 1 through December 15.

Very truly yours,

Clifford W. Kline

Clifford W. Kline
CSI Project Manager

WPL/sjr

PROJECT PROGRESS REPORT NO 3

ROSE CHEMICALS SITE CLEANUP

STATUS FOR PERIOD 12/01/86 - 12/15/86

HIGHLIGHTS

- o The Rose Chemical site detailed inventory is underway. 706 transformers have been located and inventoried. Also 120 wood or metal crates have been inventoried.
- o Final disposal of the Holden POTW stabilized sludge has not received approval. The necessary Special Waste permit has not been signed by the proposed landfill.
- o A site water discharge permit is being prepared to be submitted to the Missouri Department of Natural resources, Division 20 - Clean Water Commission.
- o Missouri Attorney General has filed suit against Martha C. Rose Chemicals alleging that the company polluted a stream near Holden with PCBs.
- o The Work Plans directed by the Statement of Work were submitted to the U.S. EPA in Kansas City on December 10.

PROJECT PROGRESS REPORT NO 3

ROSE CHEMICALS SITE CLEANUP

STATUS FOR PERIOD 12/01/86 - 12/15/86

ROSE CHEMICAL SITE DETAILED INVENTORY

The inventory plan scope of work agreed to in the Phase 1 Statement of Work is underway. The inventory of the transformers has been essentially completed. The final count to date is 706 transformers. All information recorded manually has been entered into the onsite database which uses Lotus 1-2-3 software and a Compaq Plus portable computer. All the data will be transferred to the bar code inventory system when it is implemented onsite.

The detailed wood and metal crate inventory was started on December 8, 1986. For the first three days, a three-person work crew averaged 40 crates per day. It is anticipated that this average will be increased to approximately 60 crates per day by January 5, 1987. When a container has multiple labels, the number of labels and information from each label is being recorded, if legible. This procedure will be stopped if it is determined that the information is not useful in allocation work.

WASTE SLUDGE DISPOSAL

The Southeast Landfill located in Kansas City, Missouri and operated by Laidlaw Corp. has not returned the Special Waste Disposal Request to the Jefferson City, Missouri office of the Missouri DNR. Southeast is the landfill that the DNR would like to use for disposing of the sludge. CSI will continue to work closely with Jim McConathy and Susan Rexard, of the Missouri DNR to expedite moving the stabilized sludge from the Holden POTW.

SITE STABILIZATION

Work has started on the preparation of a water discharge permit for the site. The permit must be approved and issued by the Missouri Department of Natural Resources, Division 20 - Clean Water Commission.

Currently, storm water run-off from the building roof drains is being discharged continuously through an inverted pipe drain out of the lower holding pond located in the southwest quadrant of the site. The drain is designed so that the inlet is above the level where PCBs could be released from the pond. The flow meanders

across the pasture area to Pin Oak Creek running along the property line. Pin Oak Creek ultimately flows into the Black Water River.

SITE MOBILIZATION

Ten Chemical Waste Management (CWM) personnel were onsite during the first 2 weeks of December. Three forklift trucks and three scales for the inventory work are now being used.

A CSI office trailer and a CWM office trailer have been brought onto the site. In addition, a CWM break/lunch trailer, a CWM decontamination trailer, and a security guard trailer give the site a thriving business look.

MEDIA NEWS

A Holden Progress news story reports that the Missouri Attorney General has filed suit against Rose Chemicals alleging that the company polluted a stream near Holden with PCBs. A copy of the article is attached to this report.

Atty. General Says Company Polluted Creek

State Files Lawsuit Against PCB Firm

Missouri Attorney General William C. Webster filed suit against Martha C. Rose Chemicals, Inc., in Johnson County Circuit Court last Wednesday alleging that the company polluted a stream near Holden with PCBs.

The lawsuit also charges that the company's president, Walter C. Carolan, has transferred the assets of Rose Chemicals among several other companies that he owns in a way that violates Missouri corporate law.

As a result, Walter C. Carolan and three other companies to which he might have transferred Rose Chemical's assets were also named as defendants in the suit. The three companies owned and operated by Carolan are American Steel Works,

Inc., W. C. Carolan, Co., Inc., and Dust Suppression Systems, Inc.

Although the company had permits from the EPA to process and dispose of PCBs, the petition alleges that this processing went beyond the scope of its Missouri charter. Also the petition alleges that Rose Chemicals discharged contaminants without the proper state permit as required by the Clean Water Law and more importantly that this discharge resulted in the contamination of state waters.

According to the petition, the Missouri Department of Natural Resources received on May 16 a complaint about a possible leak at the Rose Chemicals plant. A DNR investigation of this complaint led to the discovery of a tank trailer that had been leaking contaminated waste oils.

The oil, contaminated with PCBs, was continuing to make its way into a nearby stream, which empties into Pin Oak Creek, a tributary to the Blackwater River.

The petition states that a former employee of Rose chemicals told investigators that the spill had occurred on May 14, 1986. This spill evidently occurred directly over a manhole that drained through a sewer into the nearby stream. Samples were taken at various points along the suspected spill route and along the stream and were found to contain PCBs.

Attorney General Webster requests an order for preliminary and permanent injunctions to force the defendants to secure all PCB contaminants at the Holden site, as well as to remove all tanks, trucks and other vessels, which are contaminated and still at the plant. The petition also asks the court to impose penalties of \$10,000 for each day athere is a violation of Missouri's Clean Water Law and to award actual damages by holding the companies responsible for costs and expenses to restore the stream and other contaminated waters to their original condition.

PCBs were banned in 1977 by the EPA after studies linked them to skin and liver disease, birth defects and cancer. The heat resistant compounds were used principally in coolant oil for transformers, capacitors, and other electrical equipment. PCBs fall under regulations of the federal Toxic Substance Control Act.

In March of 1982, the EPA gave Rose Chemical approval to process and dispose of PCBs at its plant in Holden and later gave further approval for the company to decontaminate electric capacitors and transformers.

Rose Chemicals cesaed operations on Feb. 28, 1986, and is currently going through bankruptcy proceedings. But twice during its operation, the EPA cited the company for violations of federal regulations, once in March, 1984, and again in February, 1985.

This summer, the EPA revoked several permits issued to Rose Chemicals for its failure to correct and prevent violations of federal regulations at the plant.

The EPA is working to contain and dispose of all PCBs and contaminated materials at the Holden site.

Ho

Vol. 1 No. 20

Loveall named Worshipful Master

Fender receives honor

Attorney General files suit

Other companies of Carolan's named in the suit were American Steel Works, Inc. W.C. Carolan Co. Inc. and Dust Suppression, Inc.

Christmas parade Saturday

The Santa house located in the Bank of Holden Parking lot will open immediately after the parade and free buggy rides provided by Clark Scrutchfield. Tom Lysinger, Ronnie Wheeler



CLEAN SITES INC

1199 NORTH FAIRFAX STREET / ALEXANDRIA VIRGINIA 22314 / 703-683-8522

January 9, 1987

Mr. George Hess
U.S. EPA
Region VII
25 Funston Road
Kansas City, KS 66115

SUBJECT: Project Progress Report #4
Rose Chemicals Site

Dear George:

Progress Report No. 4 for the Rose Chemicals site at Holden, Missouri is attached. This report covers progress from December 16 through December 23rd. No work was performed from December 24 through January 4, when Chemical Waste Management's site team took their annual Christmas vacation.

Very truly yours,

Clifford W. Kline

Clifford W. Kline
CSI Project Manager

WPL/sjr

PROJECT PROGRESS REPORT NO 4

ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR PERIOD DECEMBER 16TH THROUGH JANUARY 4, 1987

HIGHLIGHTS

- o 103 empty sodium drums were shipped from the site to Trade Waste Incineration, Inc. in Sauget, Illinois, for disposal.
- o One 20,000 gallon emergency spill clean-up tank is now on site.
- o No work was done at the site during the holidays beginning December 24, 1986 and ending January 4, 1987 because Chemical Waste Management's site team took their annual Christmas vacation.
- o To promote positive community relations, Clean Sites Inc sponsored three Christmas greetings drawn by Holden elementary school children and published in the Holden Progress December 25, 1986.

PROJECT PROGRESS REPORT NO 4
ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR PERIOD DECEMBER 16TH THROUGH JANUARY 4, 1987

DISPOSAL OF SODIUM AND REACTANT CHEMICALS

On December 17, 1986, 103 empty sodium drums were shipped from the Rose Chemical Co. site warehouse to Trade Waste Incineration, Inc. located in Sauget, Illinois. The Uniform Hazardous Waste Manifest required to ship this material was signed by John R. Stonitsch, Trustee for the Bankruptcy Estate of Martha C. Rose Chemicals, Inc. The small cans full of sodium that had been stored in the sodium locker were overpacked in a lab pack drum for shipment.

Approximately 100 drums of hazardous reactant chemicals stored in the American Steel bay were sampled and analyzed for identification. The analytical results show that all the liquids do contain PCBs. Consequently, all these drums must be sent to a PCB approved incinerator. Work is underway to obtain prices for disposal of these chemicals.

SITE STABILIZATION

One large 20,000 gallon storage tank is now on site, satisfying the SOW requirement for an emergency tank large enough to hold the contents of the largest storage tank on the site, if it should rupture and spill the total liquid volume into the emergency retaining area. In addition, fifty 55 gallon drums and several pallets of "Sorball" to soak up leaks of liquids are located throughout the warehouse.

A general site clean-up has been completed. Wooden crates on the west dock area have been restacked. Scrap steel in damaged crates has been placed in good secure crates to reduce the danger of stacked crates collapsing.

SITE MOBILIZATION

No work was done at the site during the period beginning December 24, 1986 and ending January 4, 1987. However, on December 29, 30, and 31, 1986, Mark Henke, CWM Project Manager and Richard Grant, CWM's Project Accountant worked in the CWM Chicago office to familiarize themselves with the new data entry computer system and to enter the completed transformer inventory data into the bar code system data base.

PUBLIC RELATIONS

Clean Sites, Inc. sponsored three Christmas greetings in the Holden Progress. Elementary school children drew a greeting card depicting the company or business assigned to them and a winning drawing was to be selected from each group assigned a particular business. All the Clean Sites drawings were excellent and, since there was no clear cut winner, A three-way tie was declared and all three entries were published. A copy of the drawings is included with this report, as well as the New Year's Greeting sponsored by Clean Sites in the same weekly newspaper.



CIMMIRON
General Insurance
116 W. 2nd, Holden
732-5521

THURSDAY, Jan. 8: FFA
ing 8:00 p.m.
FRIDAY, Jan. 9: Green Ridge,
there, varsity boys and girls and JV
boys at 5:30 p.m.

Got News?
Call 732-4115

The Golden Progress

By

Church News

Rev. Mike Kiely will preach at Houts Chapel Jan. 4th at 10:45 a.m. Mike will be our new minister for 1987. We welcome Mike and Brenda back to our community.

Christmas News

Mr. and Mrs. Gary Shanks and Angela were dinner guests Christmas Day of Mr. and Mrs. Fred Tock and Vera Bowie.

Mr. and Mrs. Edgar Scott were Christmas guests of Mr. and Mrs. John Scott and family.

Mr. and Mrs. George Waddle, Aaron and Marva Kay were Christmas Day guests of Mr. and Mrs. Estel Andrus.

Mr. and Mrs. Wilton Williams were Christmas Day guests of the Wendell Williams family.

Christmas Day guests of Mr. and Mrs. Jim Weigand were: Dewey Johnson, Anna Weigand, Betty Weigand of Albany, Mrs. Ola Cleland, Mr. and Mrs. Eric Dameron and girls, Mr. and Mrs.

Tom Weigand and g Mrs. Dan Weigand ar Weigand, Mrs. Stepl and Rachel, Mark Sha Brent, Shelli, and S Mrs. Harold Shanks, Henry Weigand. Ew were Mrs. Mark Shan Drew, Mrs. Mike W Gary Shanks, Stephen Kurt.

Betty Weigand o spending the holidays Mrs. Henry Weigand.

Mr. and Mrs. Marl family hosted the E Christmas of Frida following present: M Harold Brown, Be Charley, Mr. and Brown and family, C.F. Hackett, Mr. Stephen Weigand and Sunday Vi

Mr. and Mrs. C.A. Mr. and Mrs. Lawre Concordia Sunday.

Celebrates Bi

Mr. and Mrs. Ji Dewey Johnson, Step and Rachel, Mr. and Shanks were guests Weigand family Sat celebrating Chad's bir

Out-of-State V Bob Nesbit of N Louisiana and Bill Miami, Florida vis afternoon with Mr. an Shanks.

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Towards A Future
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and Progress!

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CLEAN SITES INC
500 W. McKissock
732-5529

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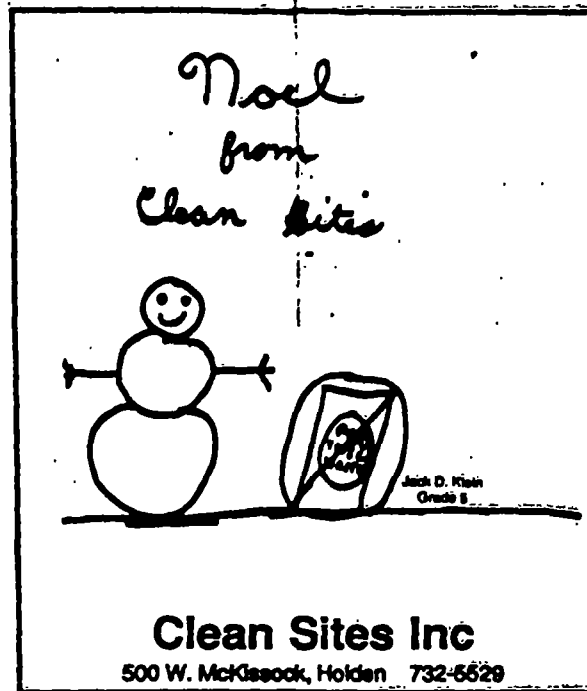
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WINNERS OF CHRISTMAS CARD DESIGN CONTEST
HOLDEN, MISSOURI

Elementary school children in Holden, Missouri, entered a contest sponsored by the Holden Progress and local businesses. The children were asked to design a Christmas card for a local business. The winners would be printed in the Christmas edition of the Progress.

Clean Sites' Holden office acted as judge for the CSI entries. They declared a three-way tie and printed these three winners.



CLEAN SITES INC

1199 NORTH FAIRFAX STREET / ALEXANDRIA VIRGINIA 22314 / 703-683-8522

January 21, 1987

Mr. George Hess
U.S. EPA
Region VII
25 Funston Road
Kansas City, KS 66115

SUBJECT: EPA Progress Report #5
Rose Chemicals Site

Dear George:

Progress Report No. 5 for the Rose Chemicals site at Holden, Missouri is attached. This report covers progress from January 5th through the 15th.

Very truly yours,

Clifford W. Kline

Clifford W. Kline
CSI Project Manager

WPL/sjr

EPA PROGRESS REPORT NO 5

ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR PERIOD JANUARY 5TH THROUGH 15TH, 1987

HIGHLIGHTS

- o Work resumed at the site January 5, 1987 after a week and a half annual holiday break for Chemical Waste Management field staff.
- o The bar code laser scanner units are being used to collect data for the drum inventory. The transformer inventory data and the 4'x4'x4' crate inventory were completed with all data entered manually. Separate sheets for each item inventoried are available.
- o Official notification was received from the Southeast Landfill of Kansas City, Missouri, that they will not accept the stabilized sludge from the Holden POTW.
- o An inspection tour of the site was made with George Hess, EPA On-Scene Coordinator. Oil film on the water in the processing area pit is being removed at his request.
- o Estimates were made of the amount of contaminated soil in drums, trash and debris, boxes of metal capacitor parts on the West dock, and empty drums. Removal and disposal of these materials may be implemented under a separate contract at the beginning of Phase 2.
- o There was a 10 inch snowfall at the site on January 8, 1987. Warm temperatures in succeeding days melted the snow rapidly.

EPA PROGRESS REPORT NO 5

ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR PERIOD JANUARY 5TH THROUGH 15TH, 1987

SITE MOBILIZATION

Work resumed on the site on January 5, 1987 after a one and a half week holiday break. The Chemical Waste Management, Inc. (CWM) work force was increased by six people to a total of thirteen. Nine people are working inside the building taking inventory. Two people are utility men assigned to restacking, cleanup, and outside work. Mark Henke is the CWM Site Manager and Richard Grant is the CWM Accounting and Data Processing Manager.

SITE INVENTORY

Six bar code scanner input units and the IBM PC computer system are now operational at the site. The system was first used at the start of the drum inventory. A label containing the drum number bar code is scanned with the laser gun to start the program. Container type, contents, and a location are entered with a laser scan of the appropriate fixed bar code on a board carried by the operator. Weight of the container, label manifest number, and label data information is entered manually by the operator. The information stored in the scanner input unit is clamped to the IBM PC computer at the end of the day. Reports can be issued daily if necessary. The following reports can be run.

1. Container number, contents, and weight by generator code.
2. Container number, type of container, contents, and weight by restaged location code.
3. Total volume or weight to date by material type
 - a. Material types are: solids, sludge, liquids, whole capacitors, capacitor metal parts, capacitor cores, transformers, and other or miscellaneous.

Completion of the drum inventory remains as planned for the last week of February. The Final Inventory Report by CWM is scheduled to be issued on February 27.

POTW STABILIZED SLUDGE

Official notification was received from Southeast Landfill, Kansas City, Missouri, a Laidlow Corp. landfill, that they will not accept the stabilized sludge from the Holden POTW. Jim McConathy of the Missouri DNR informed CSI that the City of Holden, the generator of the sludge, will receive the letter of rejection from Southeast.

Chemical Waste Management can take the sludge at one of their landfills outside the State of Missouri if the appropriate state agency grants approval. All CWM internal approvals have been obtained. CWM is now requesting approval from the Kansas DNR to landfill the material in their Kansas City, Kansas, landfill site.

EPA INSPECTION

An inspection tour of the site was made with George Hess, EPA On-Scene Coordinator. He requested that the oil film on the water in the processing area large pit be skimmed off and stored on site in a tank or drum. CWM has started to do this job.

The overall site appearance inside and outside the building has improved appreciably in the last month.

CONTRACT PROPOSALS

Estimates of the amount of contaminated soil in containers, trash and debris, empty drums, and boxes of metal capacitor parts on the West dock have been made. The following quantities were estimated.

1. PCB contaminated soil in containers = 1,000,000 pounds.
2. Wooden pallets = 475 C.Y.
3. Trash and debris = 400 C.Y.
4. Scrap metal including bins, a junked car, a van, miscellaneous duct work and non-porous capacitor parts = 375 C.Y.
5. Empty drums = 3550 each

Removal and disposal of these materials may be done at the beginning of Phase 2 under a separate contract.

OTHER NEWS

There was a 10 inch snowfall at the site on January 8, 1987. Immediately after that date, the temperature reached 60°F for several days and the snow cover disappeared. The run-off from the site is slow and there are a number of very wet areas and plenty of mud.



CLEAN SITES INC

1199 NORTH FAIRFAX STREET / ALEXANDRIA VIRGINIA 22314 / 703-683-8522

February 5, 1987

Mr. George Hess
U.S. EPA
Region VII
25 Funston Road
Kansas City, KS 66115

SUBJECT: EPA Progress Report #6
Rose Chemicals Site

Dear George:

Progress Report No. 6 for the Rose Chemicals site at Holden, Missouri, is attached. This report covers progress from January 16th through the 31st. Progress photographs from the site are also included.

Very truly yours,

Clifford W. Kline
Clifford W. Kline
CSI Project Manager

WPL/sjr

EPA PROGRESS REPORT NO 6
ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR PERIOD JANUARY 16TH THROUGH 31ST, 1987

HIGHLIGHTS

- o The inventory of transformers, crates and drums in the Main Building has been completed.
- o The computerized inventory data base software system can generate customized inventory data reports.
- o The disposal of the Holden POTW stabilized sludge has been delayed until after a February 20 meeting involving all landfill operators and local and state government agencies in the Kansas City area. Other alternatives for the disposal of the sludge are being considered.
- o Soil samples using a 50 X 50 foot grid for the site have been taken. Samples have been sent to Langston Laboratories for analysis. Sampling of the water in the ponds and the "pit" of the Main Building, as well as the berms around the ponds and at "hot spots" identified by the analysis of 50 X 50 foot grid samples will be done in February.

EPA PROGRESS REPORT NO 6

ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR PERIOD JANUARY 16TH THROUGH 31ST, 1987

SITE INVENTORY

The inventory on the following items stored in the main warehouse at the Rose Site has been completed.

1. Transformer Inventory (excluding weighing of transformers).
2. Box and Crate Inventory.
3. Drum Inventory.

The entire drum inventory was done using the hand-held data input units and laser gun scanners. All the drum inventory information is stored in the IBM computer data base.

The transformer inventory was done manually and the original data sheet for each transformer is on file. Data from these sheets were entered into the computer data base by keyboard entry and a transformer report can now be printed. Because of the difficulty in moving transformers, no weight was taken when the original inventory was made. The Allocation Subcommittee has directed that weight of each transformer is required. Weighing will be done in February.

The box and crate inventory was done manually also and each data sheet is on file. At this time, information from the data sheets is being entered into the computer data base. This task will be completed in February.

A report by sequential article number, a report by generator code, and a report by warehouse location can be generated. Using the d-Base III Plus software, customized reports can be generated as needed.

HOLDEN POTW SLUDGE DISPOSAL

Early in January, tentative agreement was reached with Chemical Waste Management to take the POTW stabilized sludge to the Waste Management Inc. Forestview Sanitary Landfill in Kansas City, Kansas. On January 27, 1987, CWM reported that Forestview could not take the material for disposal until after a February 20, 1987, meeting involving all the landfill operators in the area, the Kansas Department of Health and Environment, and Kansas City, Kansas City officials. The meeting is related to the publishing of a news article in the January 25, 1987, edition of The Kansas City Star alleging some criminal activities by a major landfill concern in the Kansas City area. The State of Kansas Department of Health and Environment has delayed approval for the disposal of special wastes until after the February 20 meeting.

Chemical Waste Management was requested to provide the cost of taking the sludge to a secure landfill in the Chicago area or to Emelle, Alabama. Also Jim McConathy, Missouri Department of National Resources (DNR), is looking for sanitary landfills in Missouri that could and would take the POTW sludge for disposal.

SITE SOIL SAMPLING

The site soil sampling on a 50 X 50 foot grid has been completed. A total of 128 additional samples have been sent to Langston Laboratories of Kansas City for PCB analysis. It is estimated that the analytical work will be completed in three weeks. When a report of all the results is received, the information will be added to the site map showing all soil sample results to date.

Samples will be taken from the perimeter of the storm water retention ponds and the bottom of the ponds at the center. The retention area at the southwest corner of the dock area will be sampled as well as the tank farm berm areas. Water samples will be taken from the ponds and the "pit" inside the Main Building.

FUTURE PHASE 1 WORK

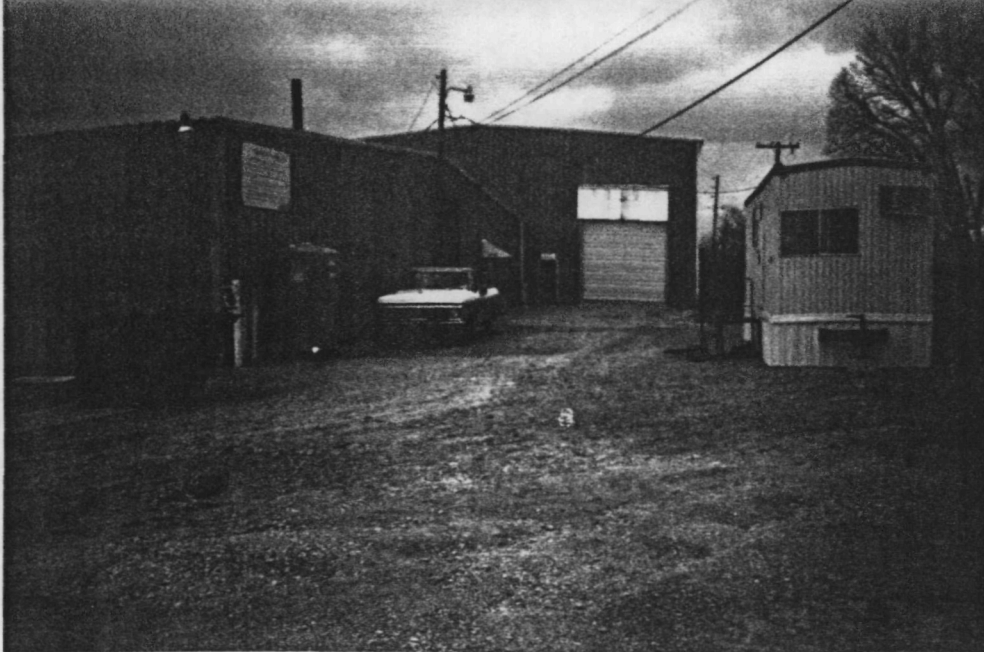
The remaining activities of Phase 1, the site stabilization and characterization phase, will be as follows:

- + complete inventory of capacitors and capacitors parts;
- + inventory of equipment in Main Building (excludes EPA returned equipment);
- + inventory and sampling of tanks;
- + weighing of transformers;
- + removal and disposal of 100 drums of reactants;
- + analysis of 50 X 50 foot grid samples;
- + sampling and analysis of water in ponds and "pit" in Main Building;
- + sampling and analysis of berms of storm retention ponds and tank farm;
- + sampling and analysis of bottom of ponds; and
- + issue of the final inventory report issue.

All of the above activities are scheduled for completion in February although analysis of sampling conducted in February may not be completed until March.

ROSE CHEMICALS SITE PHOTOGRAPHS

In order to obtain a better understanding of the progress described in this report, some photographs taken at the site in January are attached. Photographs of the six CWM and CSI trailers onsite are shown as well as photographs of the tanks, debris at the West Dock, the storm retention ponds and the South Warehouse.



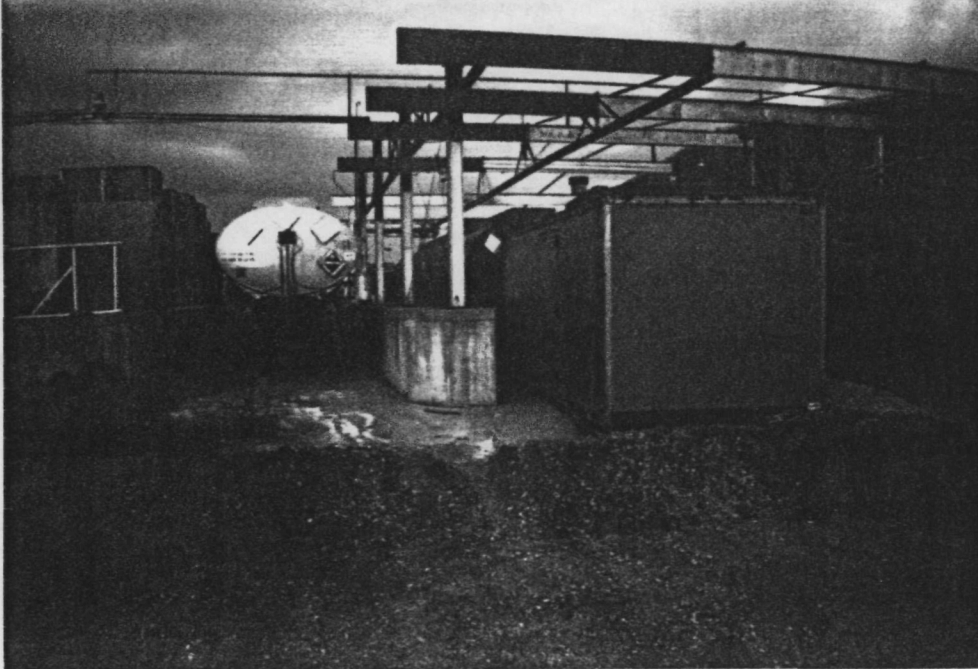
East Side Looking North
American Steel Bay Door
Guard Trailer



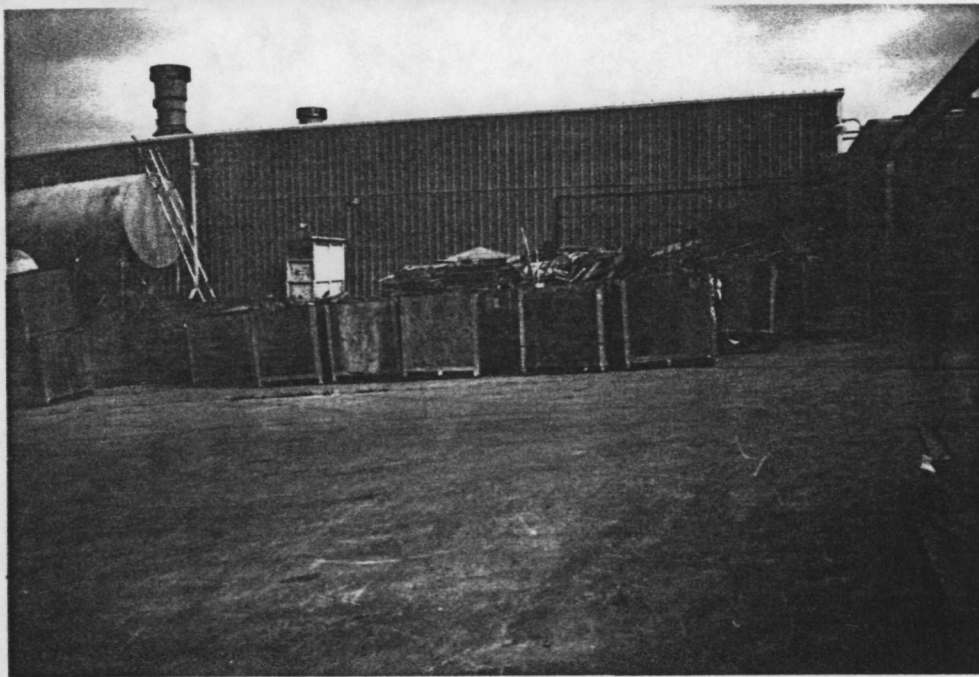
CSI and CMW Office Trailers



CMW Emergency Response
Decontamination
Break/Storage
Trailers



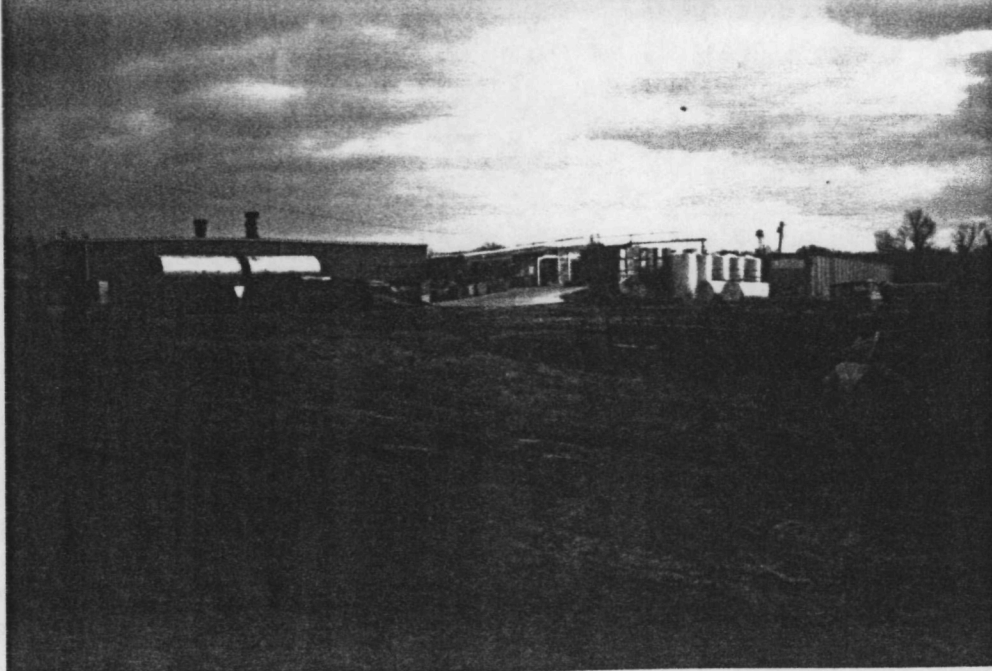
West Dock Area
Looking North 1-6-87



West Dock Area - Broken Pallets for Disposal



West Side of Site
Looking North



View Looking Northeast
1-6-87



View Looking West, Storm Retention Ponds - POTW in Distance



South Warehouse



CLEAN SITES INC

1199 NORTH FAIRFAX STREET / ALEXANDRIA VIRGINIA 22314 / 703-683-8522

March 2, 1987

Mr. George Hess
U.S. EPA
Region VII
25 Funston Road
Kansas City, KS 66115

SUBJECT: EPA Progress Report #7
Rose Chemicals Site

Dear George:

Progress Report No. 7 for the Rose Chemicals site at Holden, Missouri, is attached. This report covers progress from February 1st through the 15th.

Very truly yours,

Clifford W. Kline
Clifford W. Kline
CSI Project Manager

WPL/sjr

EPA PROGRESS REPORT NO 7

ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR PERIOD FEBRUARY 1ST THROUGH 15TH, 1987

SITE INVENTORY

The inventory of the material on the Rose site is approximately 95% completed. In the last two weeks all bulk liquids stored in 68 storage tanks of various sizes, including the two truck tankers, have been inventoried. 384,000 gallons of liquids are stored in these 68 tanks. Each tank has been sampled. The analysis of each sample will be made as required to make decisions about the methods of disposal.

The task of weighing transformers that were inventoried at the beginning of the inventory work has been started. Approximately fifty transformers onsite will not be weighed because they are too large to be handled with conventional lifting equipment without knocking out walls and removing doors/beams. Most of these large transformers have a name plate and a weight can be obtained from the manufacturer, if necessary.

SITE SOIL SAMPLING

Surface soil samples have been taken in the area outside the fence line, but inside the site property survey line. The entire site has now been sampled on a 50' X 50' grid. The results of the analysis of all surface soil samples will be tabulated and recorded on the site soil sample map.

SITE SECURITY

Three firms have looked at the site and discussed ways to install electronic security systems on the doors of the two buildings and in several general areas in the main warehouse. Any security system will not give complete coverage. When the bids for the systems are received, they will be carefully evaluated and the practicality of installing all or parts of the systems will be studied before any decision is made to purchase them.

PERSONNEL

Chemical Waste Management has started to reduce the work force onsite. The total number of Chemical Waste Management personnel onsite was twelve on Friday, February 13. As all phases of the inventory work are completed, this number will be decreased.

A crew of approximately five people will stay on the site for several weeks to complete the remaining miscellaneous work to be done i.e. inventory, sampling and analysis, spill prevention control and sludge removal.

PHASE 1 WORK PLANS

A redraft of the Phase 1 work Plans is underway by Chemical Waste Management and CSI. The Work Plans presented to the EPA in December did not contain sufficient site specific information. Drafts of the Work Plans will be reviewed with Steve Kinser and George Hess of the EPA prior to the formal submittal.



CLEAN SITES INC

1199 NORTH FAIRFAX STREET / ALEXANDRIA VIRGINIA 22314 / 703-683-8522

March 05, 1987

George K. Hess
USEPA, Region VII Laboratory
25 Funston Road
Kansas City, Kansas 66115

Dear George,

I am writing to let you know that I will be away from the site on vacation beginning March 06, 1987, returning on March 16, 1987. Jim O'Brien from our Clean Sites office in Alexandria, VA will be on the site beginning March 09, 1987 thru March 13, 1987 as Project Manager. Jerry Hollingsworth will be here also to handle the regular day-to-day work. If you need any information or help to do your job, they will be glad to assist you.

We have begun to siphon the water out of the NW tank farm containment area using the plan you and I talked about by phone on March 02 1987. The analysis of the water in this pond reported < 0.1 ppb PCB. CWM is using a small diameter garden hose to siphon water over the berm and discharging the effluent on the ground. The water runs SE along the storm water ponds and ultimately off the site to Pin Oak Creek. When this containment area is drained, we shall try to make a simple sump on the low end, using a 55 gallon drum to give easy access to drain rainwater from now on.

I will call you on March 16, 1987 when I get back in the office.

Sincerely,

Cliff Kline
Project Manager
CSI



CLEAN SITES INC

1199 NORTH FAIRFAX STREET / ALEXANDRIA VIRGINIA 22314 / 703-683-8522

March 3, 1987

Mr. George Hess
U.S. EPA
Region VII
25 Funston Road
Kansas City, KS 66115

SUBJECT: EPA Progress Report #8
Rose Chemicals Site

Dear George:

Progress Report No. 8 for the Rose Chemicals site at Holden, Missouri, is attached. This report covers progress from February 16th through the 28th.

Very truly yours,

Clifford W. Kline by WPL
Clifford W. Kline
CSI Project Manager

WPL/sjr

ROSE:reports/epa_prgrsrpt8

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EPA PROGRESS REPORT NO 8

ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR PERIOD FEBRUARY 16TH THROUGH 28TH, 1987

HIGHLIGHTS

- o The Phase 1 detailed inventory of transformers, crates, drums and tanks is essentially complete. The only outstanding activity is weighing approximately 50 transformers.
- o The Missouri DNR continued their efforts to find a landfill that will accept the solidified sludge from the Holden POTW. The Special Waste Permit request was submitted to the DNR on February 27.
- o 72 drums containing hazardous materials were shipped from the Rose site to the SCA incinerator in Chicago, Illinois on February 25.
- o The sample storage area in the Main Building has been made secure by closing in the area. Only one door is provided for access and this will be locked when the room is not in use.
- o A four tank carbon adsorption unit has been brought on-site to treat 50,000 gallons of decon water from the showers and washing machines.
- o Chemical Waste Management has reduced work force to eight people on February 27 from thirteen on February 13 and eighteen on January 30.
- o The redraft of the Phase 1 Work Plans was reviewed informally with the EPA on February 19.

EPA PROGRESS REPORT NO 8

ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR PERIOD FEBRUARY 16TH THROUGH 28TH, 1987

INVENTORY

The Phase 1 detailed inventory of transformers, crates, drums, tanks and miscellaneous equipment is essentially complete. The only outstanding activity is weighing approximately 50 transformers which are either too heavy for the available weigh scales or too large to be lifted without knocking out walls or removing beams or door frames for equipment access. An attempt to weigh these transformers will be made to complete the inventory.

SLUDGE REMOVAL

The Missouri DNR continued their efforts to find a landfill that will accept the solidified sludge from the Holden POTW. The Double D landfill at Carrollton, Missouri, has indicated that they will accept the sludge. The Special Waste Permit request was submitted to the DNR on February 27 and it is anticipated that the permit will be issued within the next few weeks. Chemical Waste Management will load the trucks and Double D will provide the trucks and transport the sludge to the landfill.

HAZARDOUS MATERIALS CLEANUP

On February 25, 72 drums containing hazardous materials were shipped from the Rose site to the SCA incinerator in Chicago, Illinois on. The breakdown of the types of materials sent is as follows:

- o Waste Corrosive Liquids

6 Drums	TOTAL = 243 Gallons
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- o Waste Flammable Liquids

32 Drums	TOTAL = 1920 Gallons
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- o Stabilized Waste Sodium Metal

34 Drums	TOTAL = 412 Gallons
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HAZARDOUS MATERIALS CLEANUP (Cont'd)

All the sodium metal and all the hazardous chemicals identified and collected by O. H. Materials have now been shipped to incinerators. The uniform Hazardous Waste Manifests required to ship these materials have been signed by John R. Stonitsch, Trustee for the Bankruptcy Estate of Martha C. Rose Chemicals, Inc.

SAMPLE STORAGE

The sample storage area adjacent to the office and laboratory area has been closed in with only one door for entry into the room. This door is locked with a secure hasp and padlock. The samples of liquids from drums, soil from drums, and liquids from the bulk storage tanks are stored in boxes and placed on shelving in this room. If an analysis is required for any sample, it can be retrieved easily and identified by the number on the bar-code label.

SITE STABILIZATION

Five thousand gallons of water have been collected from the CWM decontamination trailer. This water is from the showers and clothes washing machines. The analysis, run by Langston Laboratory, reports 72 parts per billion PCBs in the decontamination water. To discharge this water to the storm water ponds or the Holden POTW, the water must contain less than one part per billion PCBs. A four tank carbon adsorption unit has been moved on site to treat this slightly contaminated decon water.

PERSONNEL

The total number of CWM personnel on the site on February 27, 1987, was eight people. The breakdown is as follows:

- 1 Project Site Manager
- 1 Health and Safety Officer/Foreman
- 4 Operating Technicians
- 1 Accounting and Computer Clerk
- 1 Computer Technician

There were thirteen CWM personnel on-site on February 13 and eighteen on-site at the peak of Phase 1 work at the end of January. Demobilization will continue with all CWM personnel demobilized at the end of March.



CLEAN SITES INC

1199 NORTH FAIRFAX STREET / ALEXANDRIA VIRGINIA 22314 / 703-683-8522

March 23, 1987

Mr. George Hess
U.S. EPA
Region VII
25 Funston Road
Kansas City, KS 66115

SUBJECT: EPA Progress Report #9
Rose Chemicals Site

Dear George:

Progress Report No. 9 for the Rose Chemicals site at Holden, Missouri, is attached. This report covers progress from March 1st through March 15th.

Very truly yours,

Clifford W. Kline by WPL

Clifford W. Kline
CSI Project Manager

WPL/sjr

EPA PROGRESS REPORT NO 9
ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR PERIOD MARCH 1ST THROUGH MARCH 15TH, 1987

HIGHLIGHTS

- o 10,000 gallons of volatile liquids were removed from the site and shipped to SCA for incineration on March 12.
- o The detailed inventory was completed and the data transferred to CSI in Alexandria for allocation database development.
- o All soil samples have been taken. 85 samples were sent to Langston Laboratories on March 13 for analysis. Air monitoring of the site is continuing.
- o The special waste permit to remove sludge from the Holden POTW was received from the Missouri Department of Natural Resources on March 13. Sludge will be loaded for transport to a landfill beginning March 19.
- o Chemical Waste Management has reduced its work force to 6 persons to complete outstanding activities.
- o The decon water filtration system was charged with charcoal and the holding tanks erected. Filtration will begin next week.

EPA PROGRESS REPORT NO 9
ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR PERIOD MARCH 1ST THROUGH MARCH 15TH, 1987

INVENTORY

The detailed inventory of the transformers and containerized solids and liquids on the Rose Chemicals site was completed. The data files have been transferred to the CSI database in Alexandria to support the allocation effort.

The transformer weighing activity was completed and because of size and location, all but ten were weighed. For these ten, the weights were taken from name plates or, if no name plate existed, an estimate was made using the volumes calculated from the measured dimensions.

SITE SOIL SAMPLING

Final sampling as identified in the Work Plans is complete. Specifically, samples were taken from the pond berms and from the 50' X 50' grid areas identified as having concentrations of PCBs > 20 ppm on the site sampling map. These additional samples were taken by splitting the 50' X 50' grid into quarters and then taking composite samples from each 25' X 25' section. A total of 85 samples were sent to Langston Laboratories for analysis on March 13.

REMOVALS

10,000 gallons of volatile liquids were removed from a tank northwest of the Main Building near the fence. These liquids were transported to Chicago for incineration in two 5000 gallon vacuum trucks. The EPA was present throughout the removal operation.

SITE SECURITY

A recommendation addressing the Rose Chemicals site security situation will be submitted during March. Three proposals were received from contractors and the various alternatives are now being evaluated.

SITE STABILIZATION AND PERSONNEL

Chemical Waste Management has reduced its work force onsite to 6 people. This crew will be involved primarily in the following activities.

- o removal of 300 cy of solidified sludge;
- o repair and replacement of tile beds in 2 drying pits;
- o solidification or filtration of spirogester sludge and disposal of this sludge or residue in a landfill;
- o relocation of pallets from west dock area;
- o inventory, QA/QC as required to support allocation work;
- o filtration treatment of 6000 gallons of decon water;
- o secure all doors and windows in Main Building and South Warehouse;
- o rerouting of roof drains, the possible source of liquids accumulating in the large pit in the process area, away from the Main Building;
- o completion of air monitoring sampling; and
- o completions of SPCC Plan review by a professional engineer and implementation of recommended actions if required for SPCC Plan approval.

PHASE 1 WORK PLANS

The redraft of the Phase 1 Work Plans will be submitted to the EPA during the week of March 23, 1987. These plans were redrafted to reflect comments made by the EPA after an informal review of the redraft on February 19 in Kansas City.

SPECIAL SITE VISITORS

On March 10, the EPA and the FBI were on site to investigate burying of material behind the Main Building. The visitors were:

- o EPA - National Enforcement Investigating Center Personnel
 - + Ronald Snyder, Richard Warner, Joyce Kopatich (Enforcement Officers)
 - + Reuben McCullers, EPA Criminal Investigations
 - + Greg Spaulds, EPA Criminal Investigations
- o FBI - Jane Mason - Special Agent

The FBI brought a backhoe to excavate west of loading dock by the north fence. Plastic was put under the dirt to avoid the possibility of spreading contamination. Photos and samples were taken. Chemical Waste Management and CSI were not involved with this investigation. All excavated material was placed back into the original location.



CLEAN SITES INC

1199 NORTH FAIRFAX STREET / ALEXANDRIA VIRGINIA 22314 / 703-683-8522

April 8, 1987

Mr. George Hess
U.S. EPA
Region VII
25 Funston Road
Kansas City, KS 66115

SUBJECT: EPA Progress Report #10
Rose Chemicals Site

Dear George:

Progress Report No. 10 for the Rose Chemicals site at Holden, Missouri, is attached. This report covers progress from March 15th through March 31st.

Very truly yours,

Clifford W. Kline by WPL

Clifford W. Kline
CSI Project Manager

WPL/sjr

Enclosures

ROSE:reports/epa_prgrsrpt10

2

CHAIRMAN OF THE BOARD/Russell E. Train PRESIDENT/Charles W. Powers BOARD OF DIRECTORS/Peter A.A. Berle, Douglas M. Costle, Louis Fernandez, Sandra S. Gardebring, Edwin A. Gee, Jay D. Hair, Donald Kennedy, Joshua Lederberg, H. Eugene McBrayer, Charles W. Powers, William K. Reilly, Henry B. Schacht

EPA PROGRESS REPORT NO 10
ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR PERIOD MARCH 15TH THROUGH MARCH 31TH, 1987

HIGHLIGHTS

- o Removal of 507 tons of stabilized POTW sludge and transport to a sanitary landfill was completed on March 30th.
- o Bids have been received and are under evaluation for additional building security. Doors and windows are being barred or covered with plywood.
- o A fire training course on how to use and re-charge the foam generating unit located on the site is tentatively scheduled for April 16.
- o Additional surface soil samples have been or are being taken within the 50' X 50' site grids to further define the extent of PCB contamination.
- o The inventory has been copied and entered into the CSI database in Alexandria, Virginia, for use in allocation work.
- o The decon water (6000 gallons) has been treated using the Chemical Waste Management carbon adsorption unit to a level acceptable for disposal.

EPA PROGRESS REPORT NO 10
ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR PERIOD MARCH 15TH THROUGH MARCH 31ST, 1987

HOLDEN POTW STABILIZED SLUDGE REMOVAL

All the stabilized sludge that had been stored in the drying pits and the truck loading pit has been removed from the plant and hauled to the Double D Sanitation Generator, Inc. sanitary landfill in Carrollton, Missouri. The removal was completed on March 30, 1987. A total of 507 tons of stabilized sludge was removed.

Jim McConathy, Missouri DNR, Tony Lerda, Holden POTW Supervisor, and I have discussed how to remove the estimated 150,000 gallons of dilute solution from the spirogester unit. The sludge overflow slurry contains about 2% solids. We agreed that stabilization of this quantity of material with cement kiln dust was not practical. A filtration using a small belt filter was discussed with five companies who manufacture or sell belt filters. Two of the companies contacted could supply equipment and complete this job in two to three months. Samples may be taken and submitted for bench scale filter tests before the final decision is made as to how the removal will be accomplished.

SITE SECURITY AND FIRE PROTECTION

Three firms have submitted bid proposals to install electronic security and fire detection equipment inside and outside the buildings. None of the proposals appear to be practical applications for this site. The proposals are under review. Some doors may be equipped with electronic surveillance and some heat rise detectors will be installed inside the main warehouse if the firms agree to work in the building using the required personnel protection. All windows will be covered with plywood and all doors, except two, will be barred on the inside with safety bars.

Planning has been started to provide training to the Holden Volunteer Fire Department on how to fight fires involving hazardous chemicals. Glenn Fire Equipment Company, Kansas City, Missouri, will present a course of how to use and re-charge the foam generating unit located on the site. This training session is tentatively scheduled for April 16, 1987.

The University of Missouri Fire and Rescue Training Institute has agreed to present a course on hazardous chemicals firefighting with emphasis on fires where PCB materials are stored. Currently, no definite schedule has been set for this training because the course must be tailored for PCBs.

SITE SOIL SAMPLING

Surface soil samples have been taken on a 50' X 50' grid patterned for the site within the survey boundaries. Ninety-two grids were sampled by taking 25 aliquots that were combined into one composite sample per grid. Forty-seven of the composite samples were reported to contain greater than 5 ppm PCBs. Those 50' X 50' grids that are greater than 5 ppm PCBs have been or will be resampled on a 25' X 25' grid to further define the contaminated areas.

SITE INVENTORY

The physical site inventory work has been completed. The inventory database has been copied and entered into the Clean Sites, Inc. computer database in Alexandria, Virginia. The D Base III Plus inventory information will remain at the Rose Site and be available for access to call up information on specific article numbers of materials as required. Access to the inventory is restricted and rigidly controlled by the CSI Project Manager. Customized reports will be generated by the CSI computer group in Alexandria, Va.

FILTRATION OF DECON WATER

The decon water (6000 gallons) has been treated using the Chemical Waste Management carbon adsorption unit. A sample of the effluent shows .6 ppb of PCBs which was determined to be acceptable for disposal on site.



CLEAN SITES INC

1199 NORTH FAIRFAX STREET / ALEXANDRIA VIRGINIA 22314 / 703-683-8522

April 22, 1987

Mr. George Hess
U.S. EPA
Region VII
25 Funston Road
Kansas City, KS 66115

SUBJECT: EPA Progress Report #11
Rose Chemicals Site

Dear George:

Progress Report No. 11 for the Rose Chemicals site at Holden, Missouri, is attached. This report covers progress from April 1st through April 15th.

Very truly yours,

Clifford W. Kline
Clifford W. Kline
CSI Project Manager

WPL/sjr

Enclosures

EPA PROGRESS REPORT NO 11
ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR PERIOD APRIL 1ST THROUGH APRIL 15TH, 1987

HIGHLIGHTS

- o Chemical Waste Management (CWM) demobilization is now scheduled for the end of the first week of May. Four CWM employees were onsite on April 15th.
- o Soil sampling map for 50' x 50' grid of entire site has been prepared. Soil sampling analysis of the 25' x 25' grids with PCB contamination greater than 10 ppm will be available by the end of April.
- o The items identified as required by the CWM Professional Engineer for approval of the SPCC Plan are now being implemented. Secondary containment dikes in the Main Building and the south warehouse are under construction.
- o E.T. Archer & Company, a Kansas City consulting firm, provided consulting on the source of water in the large pit in the Main Building. In the opinion of the engineers involved, the source of water is from the water table. In any case, the roof drains in the area have been or will be rerouted away from the pit.
- o The EPA returned a large, 40 foot boat from a junk yard site approximately 5 miles from Holden. The boat was positioned on timbers at the northeast corner of the south warehouse.
- o An leak from a tanker was detected at 1:00 am, April 15. The spill was contained immediately and the EPA was notified.

EPA PROGRESS REPORT NO 11

ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR PERIOD APRIL 1ST THROUGH APRIL 15TH, 1987

CHEMICAL WASTE MANAGEMENT DEMOBILIZATION

With the inventory complete, Chemical Waste Management (CWM) has demobilized the staff onsite to the number needed for completion of the remainder of Phase 1 site stabilization activities. Four CWM employees are presently onsite, one foreman, two technicians and one database/accounting clerk. Demobilization of CWM staff is now planned for the end of the first week of May. In order to provide the emergency response capability for the site that is now provided by CWM, response contractors (including CWM) will be screened and one will be selected prior to CWM's demobilization.

SAMPLING AND ANALYSIS STATUS

Analysis of the 50' x 50' grid soil samples has been completed by Langston Laboratories. Results have been entered on a site sampling map which also includes the results of the O.H. Materials sampling completed in September 1986. Where the 50 foot grid sampling analysis showed sections with PCB contamination greater than 10 ppm, additional samples were taken by separating the 50' x 50' grids into quarters. Results of the analysis of these samples should be available next week and a site sampling map to show these results will be developed immediately thereafter.

Air and water sampling and analysis has been completed and the results will be included in a final Phase 1 sampling report which will include the soil sampling. This final Phase 1 report will be available in May.

HOLDEN POTW SLUDGE REMOVAL STATUS

Although 507C.Y of sludge were removed from the drying beds and loading pits during March, the Spirogestor sludge and 8 C.Y. of the drying bed sludge remain to be removed. The Missouri DNR is providing assistance with the regulatory requirements for land application of the sludge. A sample of the Spirogestor sludge has been sent to Langston Laboratories for analysis. Results will determine where the land application can be done.

In the area where the sludge was stored at the POTW, fill, grading, seeding, and landscaping will be required. Also the fence along the east boundary needs repair and approximately 150 feet of this fence will need to be replaced. Prices are being obtained by CSI for both of these activities.

SPCC PLAN

Activities identified by the CWM Professional Engineer (P.E.) as required for approval of the Spill Prevention Control and Countermeasure Plan are now underway. Spill containment dikes will be constructed with sand bags at two locations around 6 tanks in the Main Building (ENR-001 through ENR-006) and around 5 tanks in the south warehouse (ENR-021 through ENR-025). This work is scheduled for the week of April 20. In addition, the capping with clay of a portion of containment berms at the northwest tank form and at the spill containment pond and loading dock tank area will be done. CSI will also check to see if the Rose Chemicals site lies in a flood plain. The draining of the large pit in the Main Building and the storm water retention ponds discharge recommendations of the P.E. will be addressed during Site Assessment to be done later this year.

RAINWATER DIVERSION FROM PIT

The large pit in the Main Building contains approximately 80,000 gallons of water. To reduce any further buildup of water in this pit two of the outside wall roof drains, thought to be contributing to the buildup, were rerouted away from the building to the storm water retention ponds. Drains from the inside roof line were not rerouted because of a concern that two of the drains appeared to be connected to a channel supporting the roof. A Kansas City consulting firm, E.T. Archer & Company, surveyed that roof drainage system and the pit on April 15 and concluded that the water in the pit was primarily a result of the water table and that the roof drains could be plugged or cutoff and rerouted without affecting the structure. Rerouting of the interior drains will be done next week.

EMERGENCY SPILL

At 1:00 am, April 15th, a security guard on a routine tour of the site discovered a small pin-hole sized leak from the discharge pipe of one of the tankers at the loading dock. Approximately 1-1/2 gallons was collected in a barrel between 2:00 and 3:00 am. The tanker was drained dry with 262 gallons

removed. The EPA Response Center was notified as well as the Johnson County Dispatcher who in turn notified the Holden Police so that they would understand the reason for the activity at Rose. It is highly unlikely that the leak started much before 1:00 am since the security guard had made his round in that area at 12:35 am. The total spill was estimated to be between 1 and 1-1/2 gallons.



CLEAN SITES INC

1199 NORTH FAIRFAX STREET / ALEXANDRIA VIRGINIA 22314 / 703-683-8522

May 8, 1987

Mr. George Hess
U.S. EPA
Region VII
25 Funston Road
Kansas City, KS 66115

SUBJECT: EPA Site Status Report #12
Rose Chemicals Site

Dear George:

The EPA Site Status Report No. 12 for the Rose Chemicals site at Holden, Missouri, is attached. This report covers progress from April 16th through April 30th.

Very truly yours,

Clifford W. Kline by *WPL*

Clifford W. Kline
CSI Project Manager

WPL/sjr

Enclosures

EPA SITE STATUS REPORT NO 12
ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR PERIOD APRIL 16TH THROUGH APRIL 30TH, 1987

HIGHLIGHTS

- o Stabilized sludge (526 tons) has been removed from the Holden POTW drying beds and truck loading pit.
- o Testing of samples of the POTW spirogester sludge is being conducted by Langston Laboratories. Higher than normal levels of lead and mercury were indicated in the first sample. The Missouri DNR requested an EP Toxicity test before permitting land application of the sludge. A very low level of PCBs (<.2 mg/kg) was indicated by the analysis of the sludge sample.
- o The fire training courses for the Holden Volunteer Fire Department are scheduled for May 7 and May 21.
- o The 50' X 50' grid map showing results of the sampling analysis has been completed. Where results indicated greater than 5 ppm PCBs, the grids were subdivided into quarters and further sampling was done. Analysis of the surface soil samples taken for the 25' X 25' grids has been completed and a map with the results will be drawn.
- o Secondary containment dikes have been constructed around 6 tanks in the Main Building and 5 tanks in the south warehouse.
- o Clay capping of the inside face of the south and west berms of the tank containment areas on the west side of the building has been completed.

EPA SITE STATUS REPORT NO 12

ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR PERIOD APRIL 16TH THROUGH APRIL 30TH, 1987

HOLDEN POTW SLUDGE REMOVAL

The last load of POTW Sludge that had been stabilized with cement kiln dust was removed from the Holden POTW on April 29 and taken to Double D Sanitation in Carrollton, MO. A total of 526 tons of dry stabilized sludge have been removed.

The spirogester tank, which is an aerobic digesting and settling unit, contains approximately 150,000 gallons of digesting sludge. The original agreement with the City of Holden requires that the underflow sludge in this tank be removed and sent to an approved disposal site. A sample of this underflow sludge was analyzed by Langston Laboratories and the results are as follows:

Total Solids by weight	4.56%
PCBs in filtrate	0.004mg per liter
PCBs in Dry Solids	0.14 mg per kg
Arsenic	less than 0.5mg per liter
Barium	22mg per liter
Cadmium	0.67mg per liter
Chromium	6.7mg per liter
Lead	65mg per liter
Mercury	63mg per liter
Selenium	less than 0.5mg per liter
Silver	0.28mg per liter
Total Kjeldahl Nitrogen	241mg per liter

Filtration of the underflow sludge and landfill of the wet solids recovered is one method of disposal being considered. The filtration would also require that the filtrate be passed through a carbon absorption unit to reduce the PCB concentration to less than 1 ppb before it could be recycled back to the treatment plant. Companies contacted to bid on filtering this underflow sludge are reluctant to use their equipment for material that contains any concentration of PCB. Bionomics, a Division of Rexnord, will submit a proposal based on using the filter in future PCB service.

Land application was suggested and supported by the Missouri DNR. It is the least costly of the two alternatives and the cleanup could be done more quickly. The concentration of lead and mercury in the sludge prompted the Missouri DNR to request that an EP Toxicity test be run on the solids before final approval for land application is given. A second sample has been submitted for analyses because of a concern about the higher than normal levels of lead and mercury in the first sample. Results of the EP Toxicity test and the heavy metal analyses of the second sample should be available by May 1. It is anticipated that the results of the EP Toxicity test will be acceptable. At that time, the Missouri DNR will approve land application and the material will be removed from the Holden POTW quickly.

FIRE TRAINING

Olympic Fire of Independence, MO., will present a firefighting seminar for the Holden Volunteer Fire Department on May 7 and May 21, 1987. Fighting oil fires with foam and dry chemicals will be emphasized. The firemen will get actual hands on training as well as classroom presentations and discussions.

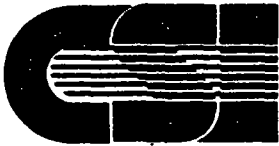
SITE SURFACE SOIL SAMPLING

The site map showing all the results of the 50' X 50' grid surface soil sampling has been completed. The information shown on the map has been used to sample all 50' X 50' grids showing greater than 5 ppm PCB on a new 25' X 25' grid. The analytical results of these samples have been received from Langston Laboratories and this information will be placed on another map showing the 25' X 25' grids sample.

No soil has been removed from the PCB contaminated area at the outfall of the storm sewer along Pin Oak Creek. A proposal for the removal of a small amount of soil in this area has been given to the EPA. However, no soil will be removed until agreement has been reached with the EPA on the PCB cleanup level requirement.

APPROVAL OF SPCC PLAN

A sand bag secondary containment dike has been built around all the tanks in the south warehouse and tanks No. 1 through 6 in the Main Building warehouse. The berms around the Rose Tank Farm Containment areas have been improved. Clay has been placed on the inside face of the west and south berms and on the west side of the building. This work should satisfy the Chemical Waste Management Professional Engineer's requirements for the approval of the Spill Prevention Control and Countermeasure (SPCC) Plan.



CLEAN SITES INC

1199 NORTH FAIRFAX STREET / ALEXANDRIA VIRGINIA 22314 / 703-683-8522

ROSE FACT SHEET

#3

May 11, 1987

Update of Activity

Sampling, inventory and site stabilization work has been completed at the Martha C. Rose facility in Holden, Missouri. The work was performed under an Environmental Protection Agency (EPA) administrative order signed by 13 of the parties that shipped polychlorinated biphenyls (PCBs) to the defunct PCB processing facility.

Clean Sites Inc., an independent, non-profit organization, assisted the parties in supervising this work and will remain on site to supervise activities at the site including the 24 hour guard service. Chemical Waste Management, the contractor that performed the work, has completed its tasks of inventory, sampling and removal of the most hazardous materials and will be leaving the site in mid May.

Emergency equipment and supplies to control spills and fires will remain on site.

In the six months since an administrative order on consent was signed by the EPA and some of the generators of PCB materials at the site, the following activities have occurred.

- * 10,000 gallons of volatile liquids (kerosene, etc.) and 178 drums of corrosives and sodium were removed and shipped to the SCA incinerator in Chicago.
- * A spill control tank and emergency response equipment and supplies, including a foam unit for fires, have been installed on site.
- * Dikes have been constructed around all tanks, both inside and outside to contain possible spills.
- * Clean Sites sponsored a training session on May 7 for local volunteer firemen and site security personnel on fire prevention and hazardous chemical fire fighting techniques. The training will be repeated on May 21.
- * Material and equipment in the building have been restacked and stabilized for safety and ease of removal.

- * Air sampling within the buildings and at the property line continues to show levels significantly less than government exposure limits.
- * Surface soil samples have been taken throughout the site and water samples have been taken from ponds and sent for analysis. Results of the chemical analyses will be reported once they are received and verified.
- * Inventory of PCB materials is completed and a report will be issued during the summer. An estimated 13 million - 15 million pounds of PCB material is present at the facility.
- * Company documents have been analyzed to identify additional generators and to prepare for allocation of costs. About 700 generators have been found and notified.

Continuing Work

The inventory information and the initial sampling data are under review in preparation for evaluating options for disposal and/or removal. A decision on how to proceed with cleanup cannot be made until this information is analyzed and evaluated and until agreement is reached between EPA and the generators about the appropriate disposal/removal techniques. The agreement must be in the form of an administrative order or consent decree which will describe the actions to be taken and the legal terms of the agreement. There is no schedule for either the remedy decision nor the agreement.

All technically feasible options including removal of the materials for offsite incineration and onsite incineration with a mobile incinerator will be evaluated. The evaluation will be based on various factors including: safety to the public, requirements of the law, permanence of the remedy, technical feasibility, practical feasibility and time for completion.

As more information on disposal/removal options is known, Clean Sites and the generators will share the information with the city of Holden, possibly sponsoring a town meeting to discuss these options. EPA and the State of Missouri will be invited to participate.

Prior Work at the Site

CSI and its contractors carried out a number of initial activities at the site in September 1986 to improve site security and safety and to make an initial determination of contamination. The work included posting a 24-hour guard, securing 200 drums of flammable or reactive chemicals, constructing a fence around the property and taking about 85 soil, water and air samples.

Contacts

Cliff Kline, CSI Project Manager, can be contacted on site in Holden, Missouri at (816) 732-5529;
Joan Ebzery, CSI director, Public Accountability, can be contacted at (703) 683-8522;
Deborah Dalton, CSI manager, Community Relations, can be contacted at (703) 683-8522.

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CLEAN SITES INC

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TELECOPIER NO. 703-548-8773
MIDWEST REGIONAL OFFICE: 1400 E TOUHY AVENUE / SUITE 215 / DES PLAINES, IL 60018 / 312-635-7580

May 8, 1987

Mr. George Hess
U.S. EPA
Region VII
25 Funston Road
Kansas City, KS 66115

SUBJECT: EPA Site Status Report #13
Rose Chemicals Site

Dear George:

The EPA Site Status Report No. 13 for the Rose Chemicals site at Holden, Missouri, is attached. This report covers progress from May 1st through May 15th.

Very truly yours,

Clifford W. Kline
Clifford W. Kline
CSI Project Manager

WPL/sjr

Enclosures

EPA SITE STATUS REPORT NO 13
ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR PERIOD May 1ST THROUGH May 15TH, 1987

HIGHLIGHTS

- o The inventory of all materials in containers and major equipment has been completed. The site database information has been transferred to the CSI Alexandria office to be integrated into the original Rose records information database.
- o The Missouri Department of Natural Resources has approved a plan for disposal of the Spirogestor tank sludge by land application on filled areas of a sanitary landfill.
- o Dye testing of the main warehouse roof drainage system showed that the roof drainage system is not contributing to the water intrusion into the pit located in the NW corner of the main warehouse.
- o Clay soil was placed on the inside face of several bulk storage tank spill contaminant dikes and sand bag dikes were placed around bulk storage tanks inside both buildings on site.

EPA SITE STATUS REPORT NO 13

ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR PERIOD MAY 1ST THROUGH MAY 15TH, 1987

ROSE SITE INVENTORY

The inventory of all materials on site has been completed and bar code labels have been placed on each container or piece of equipment. Several inventory reports can be generated from the information in the site database. These reports show the type of container, the contents, the weights of material in the container, the number of labels, and, if available, manifest number and received or storage date. The information in the site database has been transferred to the CSI Alexandria office and will be integrated into the existing Rose database created from original Rose records.

Jane Mason, FBI, and Reuben McCullars, EPA, visited the site and asked for the retrieval of 24 containers that they wanted to inspect and obtain additional data placed on the drums by Rose employees. All 24 drums were retrieved in one day and placed in the American Steel bay for inspection. This exercise demonstrated that our retrieval system works well.

HOLDEN POTW SLUDGE REMOVAL

The Missouri Department of Natural Resources has approved a plan for disposal of the Spirogest tank sludge by land application on filled areas of a sanitary landfill. A&M Sanitary landfill in Creighton, MO. was chosen as the disposal site from a list of three acceptable sites proposed by Jim McConathy, Missouri, DNR.

The analysis of a sample of the sludge taken from the bottom outlet of the Spirogest showed that it contained 4.5% solids. These solids contained 0.14 ppm PCB on a dry weight basis and the clear filtrate contained 4 ppb PCB. The heavy metals analysis showed mercury and lead were higher than normal although not a problem. At the request of the DNR, an EP Toxicity test for heavy metals was run on a second sample. The results showed all heavy metals to be below detectable limits in the extraction solution.

A copy of all analytical results and a work plan describing how the material would be transported, unloaded, and spread was submitted to the DNR. The sludge will be transported from Holden to the A&M landfill site by Hopkins Trucking, Inc. in a 5000 gallon capacity tanker trailer. The material will be spread at the landfill site at the rate of 10,000 gallons per acre. Verbal approval has been given by the DNR for these plans and the first load of Spirogestor sludge will be hauled to the A&M Sanitary landfill on May 18, 1987.

MAIN WAREHOUSE ROOF DRAIN PROJECT

E.T. Archer and Company, Consulting Engineers located in Kansas City, Missouri, dye tested the roof drainage system to determine the discharge points for the roof drain inlets. The results showed that 14 roof drains discharge to the storm sewer manhole located at the southwest corner of the main warehouse. This manhole then drains to the storm water containment ponds. Two other roof drains discharge to the containment basin at the southwest corner of the loading dock. This basin has no outlet. It contains very little water and discharge from the two roof drains is no problem because this containment area has a large volume and also a high evaporation rate. The four downspout drains on the east side of the building flow through a tile to the southwest storm water manhole and thence to the storm water ponds. The two west side downspout drains that have been diverted into surface plastic drain piping as requested by Roy Ball, also would drain through a tile to the southwest storm water manhole and then to the storm water ponds.

The Archer study concludes that the roof drainage system is not contributing to the water intrusion into the pit in the processing area located in the northwest corner of the main warehouse. A slight base flow of water was observed in the east-west storm drain. The water was clear and the conclusion is that the source is groundwater infiltrating into the underground drain line. This is evidence of a high water table in the area. No further work will be done on diversion of the roof drains.

SPILL CONTAINMENT IMPROVEMENT

Additional clay soil was placed on the inside face of the west and south dikes around the northwest tank farm containment area and on the inside face of the west dike around the southwest containment area. This clay soil should decrease the permeability of the dikes.

A sandbag dike approximately 18 inches high was placed around all the bulk storage tanks in the main warehouse and south warehouse. These dikes will provide emergency containment of any spilled liquids until the spill can be pumped to the emergency storage tank on site.

Also, approximately 30 yards of clay soil is now stock piled on site to be used for emergency containment if a spill should occur.



CLEAN SITES INC

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June 12, 1987

Mr. Steve Kinser
U.S. EPA
Region VII
25 Funston Road
Kansas City, KS 66115

SUBJECT: EPA Site Status Report #14
Rose Chemicals Site

Dear Steve:

The EPA Site Status Report No. 14 for the Rose Chemicals site at Holden, Missouri, is attached. This report covers progress from May 15th through May 31st.

Very truly yours,

Clifford W. Kline
CSI Project Manager

WPL/sjr

Enclosures

cc: Mr. George Hess
U.S. EPA
Region VII
25 Funston Road
Kansas City, KS 66115

EPA SITE STATUS REPORT NO 14
ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR PERIOD May 15TH THROUGH May 31ST, 1987

HIGHLIGHTS

- o A second fire fighting training session was held for the Holden Volunteer Fire Department on May 21, 1987. A Super-Jet foam nozzle was presented to Chief Day at the end of the session.
- o An emergency response coverage contract has been signed with O.H. Materials, Incorporated.
- o Chemical Waste Management demobilization has been delayed until June 4, 1987.
- o By the end of May, 36,000 gallons of sludge had been removed from the Holden POTW and land applied to a sanitary landfill.
- o John Mathes & Associates of Columbia, Illinois, has been selected to perform investigation of the subsurface contamination of the site.

EPA SITE STATUS REPORT NO 14

ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR PERIOD May 15TH THROUGH May 31ST, 1987

SITE SECURITY

A second firefighting training session was held for the Holden Volunteer Fire Department on May 21, 1987. Approximately 20 people attended the session conducted by the Olympic Fire, Incorporated. All the Danguard site security people attended the session and each security guard used a 20 pound dry chemical extinguisher to put out a gasoline diesel fuel fire in a mock-up of a drum storage area.

At the end of the training session, a Super-Jet foam nozzle that is very effective in fighting oil fires was presented to Chief Day, Holden Fire Department, as a donation of equipment from the PRP group involved in the site cleanup work.

A small wheeled foam jet cart has been purchased for use on the site. This unit was used in the firefighting training session and is now on site. 30 gallons of foam concentrate are also available to be used with this unit.

EMERGENCY RESPONSE

The contract with O.H. Materials used for initial site work has been amended for emergency response coverage at the Rose Site. The people who would respond to a site emergency will be dispatched from the O.H. Materials, St. Louis, Missouri, location. Response time will be approximately 5 hours.

SITE DEMOBILIZATION

The Phase 1 contract work was to have been officially completed on May 22 and all Chemical Waste Management people were to have been demobilized on that date. However, when the final walk through inspection was made, one stack of 55 gallon drums

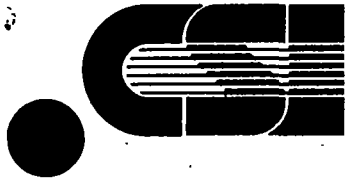
containing liquids four pallets high had shifted and were leaning against the adjacent row of drums. Two Chemical Waste Management people were instructed to remain on site to move drums, place them on sturdy pallets and restack them. Chemical Waste Management will stay on site to complete this work and several other safety and housekeeping chores. The new demobilization date is June 4, 1987.

HOLDEN POTW WORK

Hopkins, Inc. started hauling anaerobic sludge pumped from the POTW spirogester tank to A&M landfill on May 18, 1987. The disposal method will be land application on filled areas of the landfill. Through May 31, 1987, approximately 36,000 gallons of sludge had been spread. Heavy rains, the week of May 25, made the landfill soft and trucks could not be driven on the filled areas to spread sludge. An average of two loads per day can be moved when the weather is dry. By the end of May, eight truck loads had been dispatched from the POTW to the A&M landfill.

PRELIMINARY SITE ASSESSMENT

The scope of work for the Preliminary Site Assessment contract was developed and a contract awarded to John Mathes & Associates of Columbia, Illinois. An investigation of subsurface contamination of the site will be performed. Mobilization of this contractor is planned for June 2. Completion of the planned scope of work is the middle of July.



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June 30, 1987

Mr. Steven E. Kinser
Regional Project Manager
U.S. EPA
Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101

SUBJECT: EPA Site Status Report #15
Rose Chemicals Site

Dear Steven:

The EPA Site Status Report No. 15 for the Rose Chemicals site at Holden, Missouri, is attached. This report covers progress from June 1st through June 15th.

Very truly yours,

W.P. Langhlin
for Clifford W. Kline
CSI Project Manager

WPL/sjr

Enclosures

cc: Mr. George Hess
U.S. EPA
Region VII
25 Funston Road
Kansas City, KS 66115

EPA SITE STATUS REPORT NO 15

ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR PERIOD JUNE 1ST THROUGH JUNE 15TH, 1987

HIGHLIGHTS

- o John Mathes & Associates, Inc. has mobilized on site to do subsurface assessment work. An electro-magnetic survey and soil gas sampling have been completed.
- o Fire fighting equipment has been purchased and will remain on-site until the cleanup is complete.
- o Chemical Waste Management people were demobilized from the site on June 4.
- o Eight-four thousand gallons of spyrogester sludge have been sent to a disposal site. A sludge sample is being analyzed to determine if all PCBs have been removed from the spyrogester.

EPA SITE STATUS REPORT NO 15

ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR PERIOD JUNE 1ST THROUGH JUNE 15TH, 1987

SITE ASSESSMENT

John Mathes & Associates, Inc., Geotechnical Consultants, mobilized on the Rose site June 2, 1987 and began the work to determine if the site had any subsurface contamination. An extensive electro-magnetometer survey of the entire site was run. The results of this survey indicated that no large quantities of metal debris were buried on the site. Tracer Research Corporation, a subcontractor for Mathes, did soil gas sampling just below the surface in selected areas where previous surface soil samples had indicated PCB contamination. This survey did show traces of some volatile organic compounds in some of the samples. The results of the electro-magnetometer survey and the soil gas sampling will be included in the final technical report that will be issued by John Mathes, Incorporated.

John Mathes has also drilled three deep test borings to a depth of approximately 50 feet and three shallow well borings to approximately 15 feet. If water is found in these borings, all may be completed to be used as ground water monitoring wells. To complete the site assessment program, 25 shallow soil test borings in the outside area and 7 soil test borings inside the building will be made.

SITE SECURITY

The following fire fighting equipment has been purchased and will remain on the site until the disposal and cleanup as been completed.

<u>Equipment</u>	<u>No. of Units</u>
Foam Jet Cart	1
Jet X Nozzle	1
Macro-foam Concentrate	30 gallons
50 lb. ABC Wheeled Dry Chemical Units	3
20 lb. ABC Hand-held Dry Chemical Extinguishers	15
1.5 inch ID Fire Hose to be used with jet cart	300 feet (6 at 50' lengths)
Hydrant Wrench	1
Spanner Wrench	2

EPA SITE STATUS REPORT NO 15

ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR PERIOD JUNE 1ST THROUGH JUNE 15TH, 1987

SITE DEMOBILIZATION

The two Chemical Waste Management technicians who had remained on site after May 22, 1987 to restack drums in the warehouse were released on June 4, 1987. Richard Grant Chemical Waste Management computer technician remained on site until June 12, 1987. Chemical Waste Management must issue a final inventory report to CSI before the CWM Phase 1 Contract is completed.

HOLDEN POTW WORK

In the last two weeks, 48 thousand gallons of spyrogeste sludge were hauled from the POTW and land applied at the disposal site in Creighton, MO. The total volume of sludge sent to the disposal site to date is 84 thousand gallons. A composite sample of three aliquots taken from the spyrogeste bottom discharge line was submitted to Langston Laboratories for PCB analyses. The amount of settled solids in the sample measured in an Imhoff laboratory settling cone is considerably less than the amount observed in a sample taken two weeks previously. This is an indication that most of the sludge blanket has been removed from the spyrogeste and the material remaining in the tank may be free of PCBs. The cleanup of the Holden POTW will be finished if the analysis of the latest sludge sample shows PCB concentrations below detectable limits.



CLEAN SITES INC

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July 6, 1987

Mr. Steven E. Kinser
Regional Project Manager
U.S. EPA
Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101

SUBJECT: EPA Site Status Report #16
Rose Chemicals Site

Dear Steven:

The EPA Site Status Report No. 16 for the Rose Chemicals site at Holden, Missouri, is attached. This report covers progress from June 16th through June 30th.

Very truly yours,

W.P. Langhli
for Clifford W. Kline
CSI Project Manager

WPL/sjr

Enclosures

cc: Mr. George Hess
U.S. EPA
Region VII
25 Funston Road
Kansas City, KS 66115

ROSE:reports/epa_statust16

2

CHAIRMAN OF THE BOARD/Russell E. Train PRESIDENT/Charles W. Powers BOARD OF DIRECTORS/Peter A.A. Berle, Douglas M. Costle, Louis Fernandez, Sandra S. Gardebring, Edwin A. Cee, Jay D. Hair, Donald Kennedy, Joshua Lederberg, H. Eugene McBrayer, Charles W. Powers, William K. Reilly, Henry B. Schacht

EPA SITE STATUS REPORT NO 16
ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR PERIOD JUNE 16TH THROUGH JUNE 30TH, 1987

HIGHLIGHTS

- o John Mathes & Associates, Inc. has completed the subsurface site assessment work. Preliminary information indicates that the sub-surface of the site is not contaminated with PCBs.
- o O.H. Materials Corporation, the Emergency Response Contractor, has two men onsite to do some non emergency leaking drum cleanup work and general site safety and housekeeping chores.
- o The Holden POTW cleanup work has been completed. The sample of the last Spirogestor sludge sample was reported by Langston Laboratories to contain less than 0.05 mg/l of PCBs.

EPA SITE STATUS REPORT NO 16

ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR PERIOD JUNE 16TH THROUGH JUNE 30TH, 1987

SITE ASSESSMENT

John Mathes & Associates, Inc., Geotechnical Consultants, has completed the site subsurface drilling and sampling work that was started on June 2, 1987. The following work has been completed:

1. Three deep test borings have been drilled to a depth of 50 feet. Ground monitoring wells have been installed in all three of these deep borings.
2. Three shallow ground water monitoring wells have been drilled to a depth of approximately 15 feet and screens were installed.
3. Twenty-five shallow soil borings have been completed to a depth of 5 feet or auger refusal. Soil samples have been taken from each of these 25 borings and submitted to Langston Laboratories for PCB and volatile organic compounds. A split of samples has been given to Black and Veatch, the EPA contractor.
4. Eight soil test borings have been drilled through the concrete floor of the main warehouse. A split spoon sampler was driven into the soil below the concrete floor to a depth of approximately 2 feet. These samples recovered were also submitted to Langston Laboratories for PCB and volatile organic compounds analysis.
5. A geophysical survey was run over the entire outside area of the site by Mathes & Associates. This survey included a magnetometer survey across areas of potential drum burials.
6. Tracer Research Corporation, a subcontractor to John Mathes, ran an onsite soil gas sample analysis at 39 selected locations that previous surface soil sampling had shown some PCB contamination.

7. A ground penetrating radar survey was made at the west end of the warehouse dock area to try to determine if any metal debris was buried in the area.

Preliminary information and test results indicate that the subsurface of the site is not contaminated with PCBs. John Mathes & Associates will issue a complete, detailed technical report when all the drilling data has been reviewed and chemical analyses are completed.

SITE SECURITY

O.H. Materials Corporation, the Emergency Response contractor from St. Peters, Mo., has two employees onsite to retrieve leaking 55 gallon drums from the stacks in Main Building and place them in overpack drums. The oil on the floor will be absorbed with Oil-Dri and the Oil-Dri will be cleaned up and placed in the overpack drums around the leaking 55 gallon drums. The OHM crew will also do other safety and housekeeping chores in the warehouse and around the site.

HOLDEN POTW WORK

The last sample of Spirogestor sludge was analyzed by Langston Laboratories and found to contain less than 0.05 mg/l polychlorinated biphenyls. A letter was written to James McConathy, Regional Administrator, Division of Environmental Quality, Missouri Department of Natural Resources, Kansas City Regional Office, stating that the clean up of the Holden POTW had been completed. A total of 93,013 gallons of sludge were removed from the Spirogestor and hauled to A and M Sanitary Landfill in Creighton, Mo. where it was land applied on filled areas that were being prepared to be seeded for grass cover.

The Missouri DNR has been requested to write a letter to the City of Holden confirming that the clean-up is complete and the plant can be operated in the future as it had been operated prior to the time PCBs were detected in the sludge.



CLEAN SITES INC

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TELECOPIER NO. 703-548-8773
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July 24, 1987

Mr. Steven E. Kinser
Regional Project Manager
U.S. EPA
Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101

SUBJECT: EPA Site Status Report #17
Rose Chemicals Site

Dear Steven:

The EPA Site Status Report No. 17 for the Rose Chemicals site at Holden, Missouri, is attached. This report covers progress from July 1st through July 15th.

Very truly yours,

Clifford W. Kline
CSI Project Manager

WPL/sjr

Enclosures

cc: Mr. George Hess
U.S. EPA
Region VII
25 Funston Road
Kansas City, KS 66115

EPA SITE STATUS REPORT NO 17
ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR PERIOD JULY 1ST THROUGH JULY 15TH, 1987

HIGHLIGHTS

HIGHLIGHTS

- o O.H.Materials Company (OHM) has completed the site clean-up work required and placed 12 leaking drums in overpack salvage drums. Work was completed on July 9.
- o Representatives of seven hazardous waste disposal contractors attended the Phase II contract site visit on July 9.
- o When the PRP Steering Committees and the EPA approve and sign the necessary paper work, removal of 50,000 to 70,000 gallons of PCB liquids will begin immediately.
- o John Mathes & Associates, Inc. has sampled the six water monitoring wells that have been drilled on the site.
- o Debbie Dalton and Cliff Kline reported on the progress of the completed work and future work at the site to the Holden City Council at their meeting on July 13.

EPA SITE STATUS REPORT NO 17
ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR PERIOD JULY 1ST THROUGH JULY 15TH, 1987

SITE STABILIZATION

OHM, the emergency response contractor, completed the following list of tasks that were begun on June 29:

1. 12 leaking drums were removed from the stacks and placed in overpack drums. Numerous other drums were found with loose bung closures as the drums of liquid were moved. The bung closure was tightened on all these drums. Also, drums were taken off broken pallets and placed on new, sound, pallets before restacking in the warehouse.
2. Contaminated oil-dri absorbent was cleaned up in front of the large metal container that holds shredded cores in Location 6 of the Main Building. Clean oil-dri was put down in front of this container.
3. A broken tile at the base of one roof drain on the east side of the Main Building was repaired.
4. A valve was installed on the storm water ponds overflow line. The valve will be left in the open position but can be closed immediately if a spill should occur on site and possibly drain to these ponds.
5. Some broken wooden pallets on the west dock area were restacked.
6. The former Rose office entry area was cleaned up. Several drums of disposal protective suits and booties were placed in one large metal bin in the main warehouse.
7. Absorbent pads were used to remove a small amount of oil sheen from the surface of the water in the large pit inside the warehouse.

The two OHM technicians left the site at the end of the day on July 9.

PHASE II CONTRACT FOR PCB MATERIALS REMOVAL

A contractor site visit was conducted on July 9. The following seven contractors attended this site visit meeting:

<u>Contractor</u>	<u>No. Of People</u>
Chemical Waste Management	5
U.S. Ecology	2
ENSCO	1
US PCI	2
CECOS	2
Pyrochem/(National Electric/Westinghouse)	3
G.E.	6

Rollins Environmental Services made a later site visit on July 15, 1987.

BULK LIQUIDS REMOVAL

A contract will be awarded to Pyrochem/(National Electric/Westinghouse) for the removal of 50,000 to 70,000 gallons of bulk liquids and incineration at the Pyrochem facility in Coffeyville, Kansas. The five bulk tanks located in the south warehouse that contain approximately 60,000 gallons of liquids will be the tanks that are emptied first. These tanks represent the highest potential risk on the site and this risk will be reduced when these tanks are empty.

Samples of the liquids in the tanks have been sent to Langston Laboratory for PCB analysis. Liquids removal can start as soon as all documents have been approved and signed by the EPA and the PRP Steering Committee.

SITE SUB-SURFACE INVESTIGATION

One John Mathes technician worked on the site for two days sampling the water from the six monitoring wells that have been drilled on the site. Jeff Young, Senior Hydrogeologist for John Mathes & Associates, Inc., met with PRP and CSI representatives in Chicago on July 13 and 14, to give a preliminary report on the work that has been done on the site. A complete final report will be written by Mathes and issued to CSI the first week of August.

COMMUNITY RELATIONS

Debbie Dalton, Clean Sites, Inc. Community Relations Director, and Cliff Kline made a presentation to the Holden City Council on July 13. They reported to the council that the inventory just completed shows that approximately 14 million pounds of PCB materials are stored on the site. The council was pleased with the work that has been accomplished but would like to see Phase 2, the complete removal of all material, started soon and completed quickly. Debbie Dalton explained the decision that would be made to accomplish removal and cited the necessity for complete agreement between the EPA and the PRP's and all documents signed before removal can begin. In addition to the council members, approximately 10 Holden citizens attended this meeting. A few questions were asked from the floor but no serious concerns were voiced at this meeting.



CLEAN SITES INC

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TELECOPIER NO. 703-548-8773
MIDWEST REGIONAL OFFICE 1400 E TOUHY AVENUE / SUITE 215 / DES PLAINES, IL 60018 / 312-635-7580

August 4, 1987

Mr. Steven E. Kinser
Regional Project Manager
U.S. EPA
Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101

SUBJECT: EPA Site Status Report #18
Rose Chemicals Site

Dear Steven:

The EPA Site Status Report No. 18 for the Rose Chemicals site at Holden, Missouri, is attached. This report covers progress from July 16th through July 31st.

Very truly yours,

Clifford W. Kline

Clifford W. Kline
CSI Project Manager

WPL/sjr

Enclosures

cc: Mr. George Hess
U.S. EPA
Region VII
25 Funston Road
Kansas City, KS 66115

ROSE:reports/epa_statust18

2

EPA SITE STATUS REPORT NO 18
ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR PERIOD JULY 16TH THROUGH JULY 31ST, 1987

HIGHLIGHTS

- o The contract for early liquids removal was signed by Pyrochem and CSI on July 25.
- o The first liquid was removed from the site on July 27 by Pyrochem to their Coffeyville, Kansas incinerator. A second tanker load of liquid was removed the following day. Total liquid removed for the month is 80,000 lbs.
- o Black and Veatch, contractor for the EPA, took dust samples in preparation for their inventory work. When analysis indicated high levels of PCBs in the samples, they deferred further activity pending resampling and analysis.
- o Chemical Waste Management submitted their final report on the site inventory on July 31.
- o After a meeting in Kansas City on July 9, the EPA gave formal approval of the amended Phase 1 Work Plans.

EPA SITE STATUS REPORT NO 18

ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR PERIOD JULY 16TH THROUGH JULY 31ST, 1987

BULK LIQUIDS REMOVAL

After long and difficult negotiations between the Rose Steering Committee Negotiating Team and the EPA, agreement was reached and approval was given for CSI to execute the contract for early liquids removal with Pyrochem (National Electric/Westinghouse). The contract was executed on July 25, and the first removal took place on July 27.

One of the vertical bulk tanks in the South Warehouse was chosen for the first removal, since it represented the highest potential risk on the site. The removal was carried out without undue difficulty. Articles from the local newspapers describing the liquid removal are attached to this report.

A second load was scheduled from the same tank on the following day, but we switched to one of the outside tanks when it was observed that thermal expansion had caused a small amount of the oil in that tank to overflow into a pool of rainwater standing inside the berm. That removal was also carried out without incident.

A log of the removals is being kept at the site as are all manifests and samples. The contract calls for Pyrochem to be paid by weight, but we are also estimating the volumes removed, the PCB concentration for each load, and the total cost. A portion of that log is shown below (PCB concentration and cost are not shown, since we do not yet have the analytical results and hence, cannot determine cost).

EARLY LIQUIDS REMOVAL LOG

-----WEIGHT-----								
DATE	ART NO	GROSS LBS	TARE LBS	NET LBS	DENSITY PPG	EST/ MEAS	VOL GALS	MANIFEST NUMBER
7/27/87	20024	82570	38890	43680	11.5	EST	3798	6951T
7/28/87	20048	75330	38970	36360	7.5	EST	4848	6954T
TOTAL REMOVED				80040			8646	

PRINCIPLES FOR EARLY LIQUIDS REMOVAL OPERATION

The following is the planned approach to the early liquids removals:

- o Each week we shall make sure that at least 5000 gallons of liquid are removed. In most cases, this will require Pyrochem to make two trips to the site each week.
- o Once a tanker trip has been authorized, the CSI Project Manager will allow the driver to fill to a reasonable level, even though that may exceed 5000 gallons for the week by a significant quantity.
- o The CSI Project Manager will strive to hold the total weekly offtake reasonably near the 5000 gallon target.

The thrust of these guidelines is that each week will be treated on a stand-alone basis. We will not underlift in week 2 to balance an overlift in week 1.

We followed these principles in the first week of offtake. The first shipment was 3800 gallons. The second shipment, of material of much lower density, was 4850 gallons. Thus, the total for the week was 8650 gallons.

During the week of August 3, two more tankers are scheduled. The plan is to remove more of the heavier liquids from the south warehouse, which means that the total volume taken should be around 7000 gallons for the week.

EPA ACTIVITIES

Black and Veatch, contractor for the EPA, began to carry out a partial reinventory of the materials on site. They wish to record additional data on some of the items identified previously by Reuben McCullars. As a first step in this process, they collected dust samples and had them analyzed for PCB concentration. We were informed that the analyses indicated high levels of PCB in the sample(s). Black and Veatch, therefore, took a second set of samples to check the initial results. They are currently waiting for the analytical results from the second set before deciding what to do next.



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September 8, 1987

Mr. Steven E. Kinser
Regional Project Manager
U.S. EPA
Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101

SUBJECT: EPA Site Status Report #20
Rose Chemicals Site

Dear Steven:

The EPA Site Status Report No. 20 for the Rose Chemicals site at Holden, Missouri, is attached. This report covers progress from August 16th through August 31st.

Very truly yours,

Clifford W. Kline

Clifford W. Kline
CSI Project Manager

WPL/sjr

Enclosures

cc: Mr. George Hess
U.S. EPA
Region VII
25 Funston Road
Kansas City, KS 66115

ROSE:reports/epa_statust20

2

CHAIRMAN OF THE BOARD/Russell E. Train PRESIDENT/Charles W. Powers BOARD OF DIRECTORS/Peter A.A. Berle,
Douglas M. Costle, Louis Fernandez, Sandra S. Gardebring, Edwin A. Gee, Jay D. Hair, Donald Kennedy, Joshua Lederberg,
H. Eugene McBryer, Charles W. Powers, William K. Reilly, Henry B. Schacht

EPA SITE STATUS REPORT NO 20

ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR PERIOD AUGUST 16TH THROUGH AUGUST 31ST, 1987

HIGHLIGHTS

- o John Mathes & Associates remobilized August 24 to conduct an investigation of the extent of PCB and non-PCB contamination beneath the Main Building and South Warehouse floor slabs.
- o Drilling of 11 holes (9 in the Main Building and 2 in the South Warehouse) was begun on August 25 and finished September 1. All holes were drilled to bedrock. Samples for the entire depth of the holes have been sent to Langston Laboratories for analysis.
- o Bulk liquids removals continued with two tanker loads removed each week. At the end of August, 42,000 gallons equivalent to 375,000 pounds of PCB liquids have been shipped to Pyrochem's incinerator in Coffeyville, Kansas.
- o Media interest in the Rose site was renewed with Kansas City TV Stations visiting the site on August 18 and 20.

EPA SITE STATUS REPORT NO 20

ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR PERIOD AUGUST 16TH THROUGH AUGUST 31ST, 1987

PRELIMINARY SITE ASSESSMENT WORK

John Mathes and Associates, Inc., remobilized their site team on August 24 to conduct further site assessment work. The additional scope of work is to address potential site contamination under the floors of the Main Building and South Warehouse and site surface contamination from runoff of non-PCB contaminants. The following is a brief description of the work completed by Mathes during the period covered by this progress report.

o Potential site contamination under the warehouse floors

Nine soil borings were made in selected locations under the Main Building floor. Two soil borings were made in the South Warehouse. For each boring, composite soil samples were taken for each eighteen (18) inches of depth to bedrock. The composite soil samples from the top two samples of each bore hole will be analyzed for PCB and non-PCB contamination. Further analysis of samples from each sequentially deeper sample will be conducted if contamination in one of the top samples is greater than 1 ppm of PCBs or 1 ppm of individual volatile organic compounds. The depth to bedrock for each boring is listed in the following table:

<u>Soil Boring No.</u>	<u>Location</u>	<u>Depth to Bedrock</u>
1	Main Building	12.0 feet
2	Main Building	12.5 feet
3	Main Building	11.0 feet
4	Main Building	12.5 feet
5	Main Building	11.0 feet
6	Main Building	11.0 feet
7	Main Building	10.5 feet
8	Main Building	12.0 feet
9	Main Building	12.0 feet
10	South Warehouse	5.0 feet
11	South Warehouse	4.0 feet

o Potential Site Surface Non-PCB Contamination

Six (6) surface soil samples were collected at locations where surface runoff leaves the site and eventually goes to the branch of Pin Oak Creek that flows along the south property boundary. These samples were taken at a depth of 0 to 12 inches. All six samples have been sent to Langston Laboratories, Leawood, KS, for analysis to determine the level of contamination for volatile organic compounds.

BULK LIQUIDS REMOVAL

Each week, two trailer tank loads of PCB liquids from the site bulk storage tanks are being sent to the Pyrochem incinerator at Coffeyville, Kansas. Through the end of August, 375,640 pounds of liquids have been shipped offsite. This weight is estimated to be equivalent to 41,922 gallons of PCB liquids. Based on the inventory conducted earlier this year, 2,900,000 pounds of liquids were stored in tanks at the Rose site before Pyrochem began their removal work. Therefore, approximately 13% of bulked PCB liquids had been removed at the end of August.

Four of the five large bulk storage tanks located in the South Warehouse are now empty. The fifth and last tank in the South Warehouse will be emptied during the second week of September.

Certificates of Destruction and Hazardous Waste Manifest documents have been received regularly from Pyrochem within two weeks after the shipments have left the site.

MEDIA INTEREST

On August 18, Channel 9 TV (ABC), Kansas City, visited the site to do a story on what is happening at the site. The media interest was renewed after the newspaper story on the indictment of Patrick Perrin was published in the August 18, 1987, Kansas City Times. A copy of the news article is attached. The TV crew shot some footage around the buildings and the old Rose tank farm. The coverage was shown at 6 P.M. and 10 P.M. Councilman Rodman and Mayor Brillhart were pleased because the coverage was very positive and focused on the clean up that has started with the removal of bulk liquids and the revitalization of the Holden business district.

On August 20, Channel 5 TV (CBS) Kansas City visited the site to interview the Project Manager off camera and to take some film footage of the buildings and external tanks on the west side. The story was the lead story on the 10 P.M. news and also was very positive. This story had more on the indictment including an interview with an EPA Enforcement official. Most of the film was on the revitalizing activities undergoing in Holden and some shots of the site with reference to the removal of 5000 gal. of PCB liquids per week.



CLEAN SITES INC

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September 17, 1987

Mr. Steven E. Kinser
Regional Project Manager
U.S. EPA
Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101

SUBJECT: EPA Site Status Report #21
Rose Chemicals Site

Dear Steve:

The EPA Site Status Report No. 21 for the Rose Chemicals site at Holden, Missouri, is attached. This report covers progress from September 1st through September 15th.

Very truly yours,

Clifford W. Kline
CSI Project Manager

WPL/sjr

Enclosures

cc: Mr. George Hess
U.S. EPA
Region VII
25 Funston Road
Kansas City, KS 66115

ROSE:reports/epa_statust21

CHAIRMAN OF THE BOARD/Russell E. Train PRESIDENT/Charles W. Powers BOARD OF DIRECTORS/Peter A.A. Berle,
Douglas M. Costle, Louis Fernandez, Sandra S. Gardebring, Edwin A. Gee, Jay D. Hair, Donald Kennedy, Joshua Lederberg,
H. Eugene McBrayer, Charles W. Powers, William K. Reilly, Henry B. Schacht

EPA SITE STATUS REPORT NO 21

ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR PERIOD SEPTEMBER 1ST THROUGH SEPTEMBER 15TH, 1987

HIGHLIGHTS

- o Removal of PCB liquids continues to proceed very well. In this period 21,133 gallons of liquids were sent to the Pyrochem incinerator in Coffeyville, Kansas. A total of 63,055 gallons equivalent to 530,000 pounds of PCB liquids have been removed by Pyrochem to date.
- o The Missouri Department of Natural Resources (DNR) has certified that the cleanup and removal of contaminated sludge from the Holden POTW has been completed. The DNR has reissued the NPDES permit for the POTW to return to normal operation.
- o Two ERT employees visited the Rose site on September 2 to help them prepare a proposal for the development of an RI/FS Work Plan.
- o Two OSHA inspectors visited the site on September 10. No inspection was made because the current CSI job activities do not fit any of the OSHA inspection categories.

They were given a tour of the Main Building and the site outside the buildings. The CSI Project Manager reviewed the work done at the site to date and answered questions. ERT, a Resource Engineering Company, has submitted a proposal in competition with another engineering firm to the CSI Office in Alexandria for evaluation.

SITE SAFETY

Two OSHA inspectors, Manuel Olmedo and John Frye from the Kansas City office, visited the site on September 10, 1987. Mr. Olmedo had inspected the Rose operation about two years ago and expected to find the PCB processing work still being done.

The CSI Project Manager informed the inspectors about the work that had been done by Chemical Waste Management, Clean Sites and others and what is currently being done at the site. Since there are just two Clean Sites, Inc. employees onsite and the current job activities do not fit any of the OSHA inspection categories, the inspectors decided that an inspection was not necessary at this time. An inspection may be made at a later date when a contractor is working on the site.



JOHN ASHCROFT

Governor

FREDERICK A. BRUNNER

Director

Division of Energy
Division of Environmental Quality
Division of Geology and Land Survey
Division of Management Services
Division of Parks, Recreation,
and Historic Preservation

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY

Kansas City Regional Office
4609 Norfleet
Independence, MO 64055
816-353-5001

1.000 Holden

September 8, 1987

Mr. Cliff Kline, Project Manager
Clean Sites, Incorporated
Holden, Missouri 64040

Dear Mr. Kline:

For your information, the NPDES permit for the Holden wastewater treatment facility has been reissued by the Department of Natural Resources. This serves to certify that, in the Department's opinion, clean-up and removal of contaminated or potentially contaminated sludge has been completed. Therefore, it should be possible for the plant to commence normal operation.

Sincerely,

DIVISION OF ENVIRONMENTAL QUALITY

A handwritten signature in cursive script that reads "James R. McConathy".

James R. McConathy
Regional Administrator

JRMc/mb

cc: Francis Brillhart, Mayor; City of Holden
Tony Lerda, O & M Enterprise
Robert Hentges, Central Office; WPCP/Permits



CLEAN SITES INC

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October 12, 1987

Mr. Steven E. Kinser
Regional Project Manager
U.S. EPA
Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101

SUBJECT: EPA Site Status Report #22
Rose Chemicals Site

Dear Steve:

The EPA Site Status Report No. 22 for the Rose Chemicals site at Holden, Missouri, is attached. This report covers progress from September 16th through September 30th.

Very truly yours,

Clifford W. Kline
CSI Project Manager

WPL/sjr

Enclosures

cc: Mr. George Hess
U.S. EPA
Region VII
25 Funston Road
Kansas City, KS 66115

ROSE:reports/epa_status22

CHAIRMAN OF THE BOARD/Russell E. Train PRESIDENT/Charles W. Powers BOARD OF DIRECTORS/Peter A.A. Berle, Douglas M. Costle, Louis Fernandez, Sandra S. Gardebring, Edwin A. Gee, Jay D. Hair, Donald Kennedy, Joshua Lederberg, H. Eugene McBrayer, Charles W. Powers, William K. Reilly, Henry B. Schacht

EPA SITE STATUS REPORT NO 22

ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR PERIOD SEPTEMBER 16TH THROUGH SEPTEMBER 30TH, 1987

HIGHLIGHTS

- o A cumulative total of 689,170 pounds of PCB liquids, equivalent to 84,597 gallons, have been shipped to Pyrochem. Early liquids removal will continue until mobilization of the Phase 2 Removal and Disposal Services contractor.
- o Two large tanks in the Northwest Containment area with a combined volume of 28,800 gallons will be used for emergency storage of spilled liquids as required by the SPCC Plan.
- o The IBM AT computer system has been out of service for several days. One CPU board has been ordered and the system should be operating in a few days.
- o John Mathes & Associates issued a draft report on September 24 of their investigation of the extent of PCB and non-PCB contamination beneath the Main Building and South Warehouse floor slabs.
- o Award recommendations for the Removals and Disposal Services and RI/FS Work Plan contractors were approved by the Rose Chemicals Steering Committee on September 29.

EPA SITE STATUS REPORT NO 22
ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR PERIOD SEPTEMBER 16TH THROUGH SEPTEMBER 30TH, 1987

BULK LIQUIDS REMOVAL

During this reporting period 159,140 pounds of PCB liquids, equivalent to 21,542 gallons, were sent to the Pyrochem incinerator in Coffeyville, Kansas. The cumulative total of PCB liquids removed from the site on this contract is 689,170 pounds, equivalent to 84,599 gallons.

The following tanks are now empty:

<u>Tank No.</u>	<u>Volume (Gallons)</u>	<u>Location</u>
20021	12,000	South Warehouse
20022	10,000	South Warehouse
20023	10,000	South Warehouse
20024	14,000	South Warehouse
20025	14,000	South Warehouse
20046	14,400	Northwest Containment Area
20048	14,400	Northwest Containment Area

TOTAL VOLUME OF EMPTY TANKS = 88,800 GALLONS

PCB liquids thought to contain the highest concentration of PCB's will continue to have the highest priority for removal in the next several weeks.

SPCC PLAN

The large 20,000 gallon emergency storage tank required by the Spill Prevention Control and Countermeasure Plan (SPCC) has been returned to Chemical Waste Management.

To replace this tank, Tank No. 20046 and Tank No. 20048, located in the Northwest Containment area, will be used to provide sufficient emergency spilled liquid storage as required by the SPCC Plan.

Also, the five tanks in the South Warehouse can be used, if necessary. The two empty tanks in the Northwest Containment area will be used as primary emergency storage because they are centrally located and liquids that might leak from other tanks could be pumped to them quickly and easily using the Teel pumps purchased for this purpose.

IBM AT COMPUTER SYSTEM

The IBM AT site computer system has been out of service for several days. Initially the problem was thought to be in the Printronix printer. Diagnosis was difficult because the failure to print was intermittent. The local Honeywell service representative recommended the printer boards be checked by the manufacturer, QMS. Accordingly this was discussed by phone with QMS and arrangements were made to send the suspect boards to QMS in Mobile, Alabama. However, before they were shipped, the replacement Epson printer failed. The Honeywell technician checked the IBM AT and found that a board controlling the print function was bad. A new board is on order and the system should be operational in a few days. The Printronix printer boards will be reinstalled and checked out onsite. Hopefully, it will not be necessary to replace them.

PRELIMINARY SITE ASSESSMENT WORK

John Mathes & Associates, Inc., completed a draft report titled "Phase 3 Site Investigation" on September 24, the originally planned completion date. This draft was issued to the RI/FS Task Force of the Rose Chemicals Technical Subcommittee for their comments. This Site Investigation Report addressed only the potential contamination under the floors of the Main Building and South Warehouse and site surface contamination from runoff of non-PCB contaminants.

Comments from the RI/FS Task Force are to be received by CSI on October 9. A final report from Mathes should be available the week of October 19.



CLEAN SITES INC

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October 22, 1987

Mr. Steven E. Kinser
Regional Project Manager
U.S. EPA
Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101

SUBJECT: EPA Site Status Report #23
Rose Chemicals Site

Dear Steve:

The EPA Site Status Report No. 23 for the Rose Chemicals site at Holden, Missouri, is attached. This report covers progress from October 1st through October 15th.

Very truly yours,

Clifford W. Kline
CSI Project Manager

WPL/sjr

Enclosures

cc: Mr. George Hess
U.S. EPA
Region VII
25 Funston Road
Kansas City, KS 66115

ROSE:reports/epa statust23

CHAIRMAN OF THE BOARD/Russell E. Train PRESIDENT/Charles W. Powers BOARD OF DIRECTORS/Peter A.A. Berle,
Douglas M. Costle, Louis Fernandez, Sandra S. Gardebring, Edwin A. Gee, Jay D. Hair, Donald Kennedy, Joshua Lederberg,
H. Eugene McBrayer, Charles W. Powers, William K. Reilly, Henry B. Schacht

EPA SITE STATUS REPORT NO 23

ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR PERIOD OCTOBER 1ST THROUGH OCTOBER 15TH, 1987

HIGHLIGHTS

- o Between October 1 and October 15, 143,050 pounds of PCB liquids, equivalent to 19,145 gallons, were sent to the Pyrochem incinerator for destruction.
- o Representatives from ERT, a Resource Engineering Company, visited the Site on October 15, 1987, to gather information necessary to prepare the RI/FS Work Plan for cleanup of the buildings and contaminated soil.

ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR PERIOD OCTOBER 1ST THROUGH OCTOBER 15TH, 1987

BULK LIQUIDS REMOVAL

During this reporting period, 143,050 pounds of PCB liquids, equivalent to 19,145 gallons, were sent to the Pyrochem incinerator in Coffeyville, Kansas. The cumulative total of PCB liquids removed from the site through October 15 by Pyrochem is 834,210 pounds, equivalent to 107,032 gallons.

The following tanks are now empty:

<u>TANK NO.</u>	<u>VOLUME, GALLONS</u>	<u>LOCATION</u>
20021	12,000	South Warehouse
20022	10,000	South Warehouse
20023	10,000	South Warehouse
20024	14,000	South Warehouse
20025	14,000	South Warehouse
20046	14,400	N.W. Containment Area
20047	14,400	N.W. Containment Area
20048	14,400	N.W. Containment Area

TOTAL VOLUME OF EMPTY TANKS = 103,200 GALLONS.

PCB liquids will continue to be pumped from tanks in the northwest containment area.

RI/FS WORK PLAN

Larry Campbell, Senior Program Manager, and Gregg Somermeyer, Environmental Engineer, visited the site on October 15, 1987. These two men are employed by ERT, a Resource Engineering Company. CSI has issued the Letter of Intent to award a contract to this company to prepare a RI/FS Work Plan for the work required to clean up the buildings and contaminated soils at the Site. Contract award to ERT is contingent on EPA approval of this contractor. The ERT people were given a complete tour of the buildings and the Site. The CSI Project Manager discussed with them the recent history of the Site and reviewed the work that has been done to date.

ERT will prepare the RI/FS Work Plan draft report and submit it to CSI and the PRP RI/FS Task Force within 45 days of the date of the Letter of Intent, October 13.



CLEAN SITES INC

1199 NORTH FAIRFAX STREET / ALEXANDRIA VIRGINIA 22314 / 703-683-8522

For Release: November 3, 1987

For More Information,
Contact: Joan Ebzery
703/683-8522

Agreement Signed To Remove 13.5 Million Pounds Of PCB-Contaminated Material From Missouri Site

An administrative order on consent has been signed to remove 13.5 million pounds of materials contaminated by polychlorinated biphenyls (PCBs) from the Martha C. Rose Chemicals, Inc., site in Holden, Mo.

The administrative order on consent was issued October 29 by the Environmental Protection Agency and signed by 16 of the companies that sent PCBs to the site and by the EPA.

Holden Mayor Francis Brillhart said, "I'm overjoyed that the removal will finally begin. I think the agreement shows that voluntary cleanups can be handled quickly and - so far - effectively. I have real confidence in the Rose Steering Committee and in Clean Sites."

Chairman of the Rose Steering Committee Jene Robinson said, "It's encouraging to see that an administrative order that provides adequate protection for the environment can be negotiated between the potentially responsible parties and the EPA without engaging in long, drawn-out and expensive litigation."

"By avoiding drawn-out legal battles the site will be cleaned faster and each party will save quite a bit of money," said Robinson, who also is manager for environmental affairs, Illinois Power Co., Decatur, Ill. "This way both the public and private interests benefit."

The Rose Steering Committee is a group of companies that sent PCBs to the site for processing and is voluntarily conducting the cleanup. Clean Sites is an independent, non-profit organization dedicated to encouraging the voluntary cleanup of hazardous waste sites.

Cleanup is expected to begin after EPA approves a detailed work plan which is to be submitted by the settling parties to the agency by the end of November.

Martha C. Rose Chemicals Inc., was a PCB treatment and disposal facility that closed down in March 1986, leaving behind the 13.5 million pounds of PCB-contaminated materials. The company is now in bankruptcy.

(over)

An earlier administrative order on consent, issued Nov. 12, 1986, required the stabilization of the site, an inventory of contaminated materials remaining at the site, and removal of flammables and some PCB-contaminated liquids.

The current order calls for the removal of contaminated materials sent to the site by the settling parties. Disposal or destruction of the material must meet requirements of the Toxic Substances Control Act, which has banned the manufacture of PCBs. In addition, the order calls for a plan to evaluate possible PCB contamination remaining on the property after the materials are removed.

###

Martha C. Rose Chemicals Site
Fact Sheet #5
November 3, 1987

An administrative order on consent was signed October 29 for the removal of 13.5 million pounds of materials contaminated by polychlorinated biphenyls (PCBs) abandoned at the Martha C. Rose Chemicals site in Holden, Mo. The agreement was reached by the Environmental Protection Agency and 16 of the parties that had sent PCBs to the site for processing.

The cleanup is expected to begin after EPA approves a detailed plan for the removal and destruction of the contaminated material, including a timetable for the cleanup work and how and where the material will be disposed. The Rose Chemicals Steering Committee, representing the institutions that send PCBs to the site for processing, is expected to submit the cleanup work plan to EPA for approval by the end of November.

A community meeting will be held after the work plan is approved to inform the citizens of Holden about the details of the removal.

Beginning in August 1987 liquids contaminated by PCBs have been moved from the site for incineration in Coffeyville, Kan. More than one million pounds of liquids containing PCBs have been removed.

Removal of the contaminated liquids will continue pending the beginning of the full cleanup.

Under the terms of the Oct. 29 order, PCB transformers are to be drained, flushed and placed in an approved landfill; soils and other contaminated solids are also to be landfilled. Fluids and capacitors are to be sent to an approved off-site incinerator to be destroyed. Meanwhile, according to the order, site security efforts must continue.

The order also requires the responsible parties to conduct a study plan to determine the residual contamination that may remain on the property after the PCBs have been removed and to outline plan for cleaning it. The remedy called for by the study could be agreed to in a future administrative order.

Preliminary studies performed over the last 10 months have concluded that contamination of the property is localized around the two buildings on site. These testing results are available at the Holden City Hall.

The Rose Chemicals Steering Committee has been helped in planning the cleanup and co-ordinating it with the settlement by Clean Sites, Inc., a non-profit, independent organization established to speed voluntary cleanups of hazardous waste sites.

Contact:

Robin Robinson, CSI Project Manager, can be contacted on site in Holden, Mo. at (816) 732-5529.

Joan Ebzery, CSI Director, Public Accountability, (703) 683-8522.

Deborah Dalton, CSI Manager, Community Relations, (703) 683-8522.



CLEAN SITES INC

1199 NORTH FAIRFAX STREET / ALEXANDRIA VIRGINIA 22314 / 703-683-8522

December 10, 1987

Mr. Steven E. Kinser
Regional Project Manager
U.S. EPA
Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101

SUBJECT: EPA Site Status Report #1
(AOC 87-F-0007)
Rose Chemicals Site

Dear Steve:

The EPA Site Status Report for the Rose Chemicals Site at Holden, Missouri, is attached. This report covers progress during November 1987. Please note that we have started a new numbering system under the new Administrative Order on Consent.

We have transmitted to Bob Morby and yourself, under separate cover, the Liquid Removal log through the end of November.

Very truly yours,

Robin J. Robinson
CSI Project Manager

RJR/clc

Enclosures

cc: Mr. George Hess
U.S. EPA
Region VII
25 Funston Road
Kansas City, KS. 66115

**PROGRESS REPORT No. 1
(AOC 87-F-0007)**

ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR NOVEMBER, 1987

HIGHLIGHTS

- o Cumulative liquids removed from the Site by Pyrochem were 1.3 million pounds through November.
- o The EPA approved our Removal Contractor.
- o Removal work plans were submitted to EPA on Nov. 19. EPA response is expected in December.
- o ERT has completed the draft RI/FS work plan; it is being reviewed by Technical Sub-committee members.
- o The EPA was roughly 40% complete with their re-inventory of the material at the Site through November.

PROGRESS REPORT No. 1
(AOC 87-F-0007)

ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR NOVEMBER, 1987

I. SITE ACTIVITIES

A. BULK LIQUID REMOVAL

Pyrochem continued to remove liquids from the site during November. The total removed during the month was 162,620 lbs. at an average price of \$ 0.33 per pound.

The cumulative amount of liquid removed under this contract is 1.3 million pounds (164,000 gal). Total cost of the work is \$425 thousand for an average price of \$0.33 per pound.

B. REMOVAL ACTIVITIES

On Oct. 22, in anticipation of the signing of the Administrative Order on Consent No. 2 (AO 2), we held a kick-off meeting at the site with our selected contractor. During this meeting relationships of CSI, the contractor, the PRPs, and EPA were presented and various clarifications were made regarding the contract and the conduct of the work.

At the same meeting we handed the Letter of Intent to the contractor. A LOI is necessary because we are not able to have a firm contract without EPA approval. It will be converted to the full contract once three criteria have been met:

- a. Signing of AO 2 by all parties,
- b. Approval by EPA of the selected contractor,
- c. Approval by EPA of the contractors work plans.

The first criterion was met on Oct 29 when EPA signed the AO 2.

Because AO 2 allowed only 15 working days for submitting the work plans, that activity was given top priority by the contractor, CSI and the PRPs. At the kick-off meeting, the contractor was given a rough draft work plan prepared by Clean Sites and based on the work plan approved by EPA for the Phase I activities. The contractor modified this plan, adapting it to his methods and systems and tailoring it to the actual work to be done in Phase II. After recycling with Clean Sites and members of the Technical Sub-committee, CSI submitted this plan to EPA on November 19, one day ahead of schedule.

EPA has indicated that approval of the plan will take several weeks. As of this writing we have received no comments from EPA.

At the same time that we delivered the work plan to the EPA, Steve Kinser returned the signed letter approving the contractor. Thus, the only step remaining before we can initiate removal is the EPA approval of the work plan.

Since submitting the plan the contractor has been working to develop a list of early purchase activities and has also continued to expand and upgrade certain sections of the work plan.

C. EPA_INVENTORY

The EPA informed CSI on November 6 that they would begin carrying out their own inventory of the material on the Rose Site on Monday, November 16. The purpose of this work is to record for each item one additional piece of data: the Rose process control number. Although the PRPs informed EPA that they did not feel this activity to be necessary for carrying out the removal, the EPA is proceeding with the operation.

They are repeating the entire inventory, ie., all items in the north warehouse are being checked. In order to do this the EPA crew is picking up virtually all material and moving it in order to be able to read the required information on the drums, crates and transformers. The work is proceeding smoothly. CSI is cooperating fully with the EPA and, as of the end of November, no problems have developed. The EPA is checking roughly 500 items per day or 5% of the total. If they continue at this rate, their work should be completed before Dec. 22.

D. MISCELLANEOUS

A small cylinder of sulfur dioxide was discovered near a trailer of EPA-returned materials. This gas was neutralized by bubbling it through a basic solution.

II. RI/FS_ACTIVITIES

A Letter of Intent was given to ERT for the development of work plans for the RI/FS. Simultaneously, CSI submitted ERT's name to the EPA for approval. That approval was received on Nov. 5 and on Nov. 19 the full contract was mailed to ERT for signature.

ERT delivered their draft of the RI/FS work Plan to Clean Sites on Monday, Nov. 28. It is currently being reviewed by CSI and members of the RI/FS Task Force of the Technical Sub-committee. The schedule for submitting this in final form to the EPA is 90 days after signature of the AO 2, or Jan. 27, 1988.

III. COMPUTER

The IBM AT computer at the site, which had been out of operation for some time, has been repaired. In addition the system has been upgraded (at no cost) to permit easy transmission of data and text files between the site and Alexandria and/or the contractor's home office. Finally, a menu driven screen has been set up on the computer, which makes access to and use of the various programs much more efficient and user-friendly.

IV. PERSONNEL

Two new employees joined the CSI staff in Holden during November.

George Duncan is the Site Works Manager. His responsibilities are day-to-day supervision of all CSI contractors at the site. He is also the primary contact with the EPA crew and their subcontractors on site.

Cindy Lou Collier joins the staff as secretary. Cindy was previously head of the Danguard Security service at the site.

V. FORECAST OF NEXT MONTH'S ACTIVITIES

The EPA is expected to continue their inventory through the first portion of December but should be finished by Christmas.

Liquids removal will continue in a routine fashion.

Mobilization for the main removal activity awaits EPA approval of the work plans. We anticipate this will begin in late December or early January.



CLEAN SITES INC

1199 NORTH FAIRFAX STREET / ALEXANDRIA VIRGINIA 22314 / 703-683-8522

January 13, 1988

Mr. Steven E. Kinser
Regional Project Manager
U.S. EPA
Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101

SUBJECT: EPA Site Status Report No. 2
(AOC 87-F-0007)
Rose Chemical Site

Dear Steve:

The EPA Site Status Report for the Rose Chemicals Site at Holden, Missouri, is attached. This report covers progress during December, 1987.

Very truly yours,

Robin J. Robinson
CSI Project Manager

RJR/clc

Enclosures

cc: Mr. George Hess
U.S. EPA
Region VII
25 Funston Road
Kansas City, KS. 66115

PROGRESS REPORT NO. 2
(AOC 87-F-0007)

ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR DECEMBER, 1987

HIGHLIGHTS

- o Cumulative liquids removed from the site by Pyrochem were 1.3 million pounds through December. Removal was stopped in mid December in anticipation of the start of the main removal work in January.
- o The Removal Work Plan was revised based on oral comments given to CSI by the EPA.
- o The electrical system, lights, and crane in the main warehouse were reactivated in preparation for the start of removal work.
- o An unsolicited bid on the Removal contract was received from Pyrochem. It was returned unopened.
- o The EPA completed their inventory on December 18.
- o The first draft of the RI/FS Work Plan was completed by ERT and reviewed by the Technical Subcommittee. A new draft will be submitted to the Steering Committee on January 11, 1988.
- o Four Technical Committee members visited the site on December 10, the day after the Technical Committee meeting in Kansas City.

PROGRESS REPORT NO. 2

ROSE CHEMICAL SITE, HOLDEN, MO.

STATUS FOR DECEMBER, 1987

I. SITE ACTIVITIES

A. BULK LIQUID REMOVAL

Pyrochem picked up two loads of liquid in early December. The total removed for the month was 76,730 lbs. or approximately 10,000 gal. After December 7, we informed Pyrochem that we would stop removal for the remainder of the month. Since we anticipate the Rollins contract will begin in January, we do not plan to reactivate the Pyrochem off-take.

Cumulative liquid removed to date is 1,303,740 lbs., or approximately 165,000 gal. A copy of the complete removal log is attached.

B. REMOVAL ACTIVITIES

EPA gave their oral comments on the Removal Work Plan to CSI on December 15. These comments were transmitted to Rollins who has incorporated them in a revised work plan for the removal activity. A meeting is scheduled for January 14 to formally view the EPA's written comments and to reach agreement on any additional modifications required in the work plan.

In preparation for start of removal activities, CSI has checked out the electrical system in the main warehouse and has reactivated the overhead crane and the mercury vapor lights. The work, which will be for Rollins's account once the removal contract is signed, was accomplished with only eight hours of outside electrician charges. We estimate that doing this work with CSI site personnel reduced the total cost by approximately \$5,000.

On December 22, CSI and a number of Steering Committee members received telexes from Pyrochem announcing that they planned to submit a new and lower bid on the Removal Contract the following day. Since accepting rebids is not permitted

under our contracting rules, we informed Pyrochem by phone of that fact and asked them not to submit the new bid. They said it had already been sent, so when it arrived on Dec 23, we returned it to them unopened.

C. EPA INVENTORY

The EPA inventory, begun in mid November, was completed successfully on December 18. A final check of the warehouse was carried out by the EPA Project Manager on December 21. The work was accomplished with no lost time accidents and three minor spills which were cleaned up without significant problems.

II. RI/FS ACTIVITIES

ERT completed their first draft of the RI/FS Work Plan on time. It was submitted to the Technical Subcommittee members, the Legal Subcommittee members, and outside council on December 21, 1987. A marathon conference call on December 29 consolidated comments and suggestions from the Technical Subcommittee members. Written comments had previously been received from several members of the Legal Subcommittee and from outside council. The comments were consolidated by Joe Kwasnik, chairman of the RI/FS task force and returned to ERT for incorporated in the final draft to be submitted to the Steering Committee. That draft will be delivered to the Steering Committee members on January 11. The document will be submitted to the EPA on or before January 27.

III. COMPUTER

The Printronix printer, which had been out of service for several months, is now back in operation. We continue to upgrade the computer facilities in preparation for tracking the removal activities. Transfer of data between Alexandria and the site has been going smoothly; however, we have experienced transmission difficulties (attributed to the telephone lines) on a numbers of occasions. We plan to install graphics capability on the IBM AT in January.

Rollins continues to work on the Materials Tracking system which will be used in recording the materials as they are removed from the site. We plan to check out this system during January prior to beginning the actual removal.

IV. MEETINGS

- A. The Technical Subcommittee met in Kansas City on December 9, 1987. Major topics of discussion were the Early Liquids Removal activity, the EPA Inventory, the RI/FS Work Plan, the

Removal Work Plan, and the Allocation Formula. Presentations were made by Duncan, Robinson and Kohanek for CSI.

- B. On December 10, the day following the Technical Subcommittee meeting, four PRP's and Jim Kohanek visited the Rose site. Steve Winship, Harold Faherty, Ken Mathias, and Dick Sternberg were the PRP representatives. They toured the warehouse and reviewed in detail plans for the main removal activity and tracking of the Early Liquids Removal.

V. FORECAST OF NEXT MONTH'S ACTIVITIES

Assuming agreement with the EPA on the Removal Work Plan in the meeting scheduled for January 14, Rollins will begin immediately to mobilize for the start of the work. Some of the main activities, as specified in the work plan, are: bringing equipment and supplies onto the site, setting up the site operations trailer and decontamination trailer, preparing truck staging areas, hooking up and testing the computer inventory control system, establishing and marking work zones, performing operation checks of all material handling equipment, and setting up safety and emergency procedures.

The RI/FS Work Plan will be reviewed and approved by the Rose Steering Committee and submitted to the EPA on or before January 27 for their approval.

MARTHA C. ROSE CHEMICALS, INC. SITE

EARLY LIQUIDS REMOVAL LOG

DATE	ARTICLE NUMBER	MANIFEST NUMBER	CERT. OF DISPOSAL	WEIGHT NET	SP.GR.	VOLUME GAL.	PCB gm/kg	CUM WEIGHT
07/27/87	20024	6951T	00775	43,680	1.168	4,489	530.00	43,680
07/28/87	20048	6954T	00784	36,360	0.881	4,955	10.50	80,040
08/04/87	20024	7172T	00841	36,420	1.060	4,125	30.00	116,460
08/06/87	20024	7173T	00855	37,520	1.030	4,373	200.00	153,980
08/10/87	20024	7208T	00859	9,150	1.210	908	450.00	163,130
08/10/87	20023	7208T	-----	30,300	1.210	3,006	450.00	193,430
08/12/87	20023	7209T	00864	43,250	1.110	4,675	380.00	236,680
08/20/87	20023	7210T	00881	17,245	0.897	2,308	87.40	253,925
08/20/87	20022	7210T	-----	20,075	0.897	2,687	87.40	274,000
08/20/87	20022	7211T	00882	31,770	0.867	4,399	8.40	305,770
08/26/87	20022	7212T	00940	20,409	0.875	2,800	2.54	326,179
08/26/87	20025	7212T	-----	15,621	0.875	2,143	2.54	341,800
08/26/87	20025	7282T	00897	33,840	0.873	4,653	0.28	375,640
09/01/87	20025	7283T	00951	36,840	0.870	5,083	1.30	412,480
09/01/87	20025	7482T	00917	8,697	0.970	1,076	3.00	421,177
09/01/87	20021	7482T	-----	26,653	0.970	3,299	3.00	447,830
09/10/87	20021	7631T	00996	39,400	0.913	5,181	1.72	487,230
09/10/87	20021	7397T	01001	18,326	0.878	2,506	4.37	505,556
09/10/87	20048	7397T	-----	24,474	0.878	3,346	4.37	530,030
09/17/87	20048	7483T	01040	45,770	0.897	6,126	7.09	575,800
09/17/87	20048	7630T	01002	7,697	0.883	1,046	15.30	583,497
09/17/87	20046	7630T	-----	35,463	0.883	4,821	15.30	618,960
09/23/87	20046	7398T	01017	37,440	0.937	4,797	18.79	656,400
09/23/87	20046	7865T	01066	32,770	0.892	4,410	20.86	689,170
10/02/87	20047	7755T	01100	37,750	0.887	5,107	34.69	726,920
10/02/87	20047	7756T	01094	44,220	0.893	5,943	51.20	771,140
10/08/87	20047	7864T	01110	17,040	0.907	2,255	38.65	788,180
10/08/87	20041	7864T	-----	16,500	0.907	2,184	38.65	804,680
10/08/87	20041	7938T	01111	27,530	0.904	3,656	3.45	832,210
10/16/87	20041	8156T	01143	44,910	0.915	5,892	4.06	877,120
10/16/87	20041	8157T	01144	34,890	0.900	4,654	4.00	912,010
10/23/87	20040	7939T	01216	33,710	1.010	4,007	1.05	945,720
10/23/87	20040	8338T	01209	40,180	1.001	4,819	0.05	985,900
10/29/87	20040	8359T	01236	39,670	0.948	5,024	140.00	1,025,570
10/29/87	20036	8360T	01215	38,820	1.170	3,983	520.00	1,064,390
11/06/87	20036	8339T	01281	31,900	1.169	3,276	550.00	1,096,290
11/06/87	20036	8617T	01326	23,090	0.965	2,872	0.87	1,119,360
11/12/87	20036	8618T	01240	38,150	1.030	4,446	220.00	1,157,530
11/12/87	20037	8618T	-----	1,610	1.030	188	220.00	1,159,140
11/20/87	20037	8687T	01347	21,210	0.900	2,829	4.29	1,180,350
11/20/87	20037	8687T	-----	11,270	0.900	1,503	4.29	1,191,620
11/24/87	20037	8686T	01299	35,390	0.880	4,828	4.03	1,227,010
12/01/87	20037	8861T	01375	10,730	0.900	1,431	15.08	1,237,740
12/01/87	20034	8861T	-----	30,370	0.900	4,051	15.08	1,268,110
12/07/87	20034	8862T	01362	35,630	0.872	4,905	1.32	1,303,740
TOTAL				1,303,740		165,068		



CLEAN SITES INC

1199 NORTH FAIRFAX STREET / ALEXANDRIA VIRGINIA 22314 / 703-683-8522

TELECOPIER NO. 703-548-8773

MIDWEST REGIONAL OFFICE: 1400 E. TOUHY AVENUE / SUITE 215 / DES PLAINES, IL 60018 / 312-635-7580

January 19, 1988

Dear Correspondent/Editor:

A public meeting will be held Tuesday, January 26 to discuss plans for the removal of approximately 13.5 million pounds of materials contaminated by polychlorinated biphenyls (PCBs) from the Martha C. Rose Chemicals site in Holden, Mo.

Representatives of the Environmental Protection Agency, the Rose Steering Committee, and Clean Sites, Inc. will be available to answer questions and take public comment.

The meeting will be held at 7:30 pm at the Holden City Hall, 101 W. 3rd St., Holden, Mo..

For further information, contact Joan Ebzery, CSI, (703) 683-8522.



CLEAN SITES INC

1199 NORTH FAIRFAX STREET / ALEXANDRIA VIRGINIA 22314 / 703-683-8522

February 12, 1988

Mr. Steven E. Kinser
Regional Project Manager
U.S. EPA
Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101

COPY

SUBJECT: EPA Site Status Report No. 3
(AOC 87-F-0007)
Rose Chemical Site

Dear Steve:

The EPA Site Status Report for the Rose Chemicals Site at Holden, Missouri, is attached. This report covers progress during January, 1988.

Very truly yours,

Robin J. Robinson
CSI Project Manager

RJR/clc

Enclosures

cc: Mr. George Hess
U.S. EPA
Region VII
25 Funston Road
Kansas City, KS. 66115

ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR JANUARY, 1988

HIGHLIGHTS

- o Changes to the Removal Work Plan were agreed in a meeting attended by the EPA, PRP representatives, CSI, and Rollins. The group resolved questions of dust containment, method of shipping transformers, and level of personnel protection to be used by workers on site.
- o A town meeting was held on the evening of January 26 to inform citizens of the activities they can expect over the next 6 months. As a result of that successful meeting, the EPA formally approved the Work Plan on February 5.
- o The Removal contract with Rollins was executed on February 10, 1988, and they began mobilizing the next day. The first removal is targeted for March 1.
- o A reportable leak was discovered in the warehouse. We used local workers for the cleanup which took 13 manhours at a cost of \$520. This is approximately \$2,000 below our emergency response contractor's estimate.
- o The draft RI/FS Work Plan was approved by the Technical Subcommittee and was submitted to Steve Kinser on January 26. Feedback is expected in the later half of February.
- o Allocation issues relating to the upcoming buyout offer were resolved in conference calls during the month. The recommendations will be made to the Steering Committee at their New Orleans meeting in early March.

Progress Report No. 3
(AOC87-F-0007)
Rose Chemical Site
Status for January 1988

I. Site Activities

A. Removal Work Plan

Work plans for the removal contract were reviewed by the Region VII EPA during early January. At a meeting held in the EPA's headquarters in Kansas City on January 14, we hammered out an agreement on the final changes to that plan. Bob Fackler represented the PRPs; Clayton Page and Gene Senat, Rollins; Bob Morby and Steve Kinser, the EPA; Bill Weis, MDNR; and Robin Robinson, Clean Sites. Representatives from Black & Veach and various groups within the EPA were also present.

The remaining main concerns of the EPA were dust containment, method of shipping transformers, and level of personnel protection in areas such as the bag room. A number of measures were agreed upon to ensure dust would not be spread. These include washing the wheels of trucks leaving the site, wrapping the large transformers which must be shipped on flatbed trucks, and vacuuming certain items prior to loading. We agreed that all small transformers will be shipped intact and in enclosed vans. Larger transformers will be vacuumed first, then wrapped for shipping. If fins have to be removed, they will be placed inside the transformer. Approval of fin removal will be on a case-by-case basis.

The question of using level B protection was resolved with the decision to open the bag room to ensure good air circulation and to monitor the air to determine when switching to level B would be required.

In addition to the big items there were a number of detailed comments which were reviewed and agreed. No substantive issues remained unresolved by the date set for the town meeting (see below).

Although the MDNR had not reviewed the plan in detail, they took no exception to it.

B. Town Meeting

Mr. Morby stated that before he could approve the removal work plan, it would be necessary for CSI to hold a town meeting, letting the citizens know what the removal plan was and giving them a chance to comment on it. That meeting was held on the evening of January 26. Jene Robinson represented the PRPs; Craig Smith and Steve Kinser, the EPA; Nick Di Pasquale and Keith Schardein, MDNR; and Joan Ebzery and Robin Robinson, CSI. The removal work plans and also the Phase III activities were discussed. No surprises occurred during the question period.

As a result of the successful town meeting, the Work Plan was formally approved on February 5, 1988 by Mr. Kinser. This was the final prerequisite for signing the contract with Rollins. The contract was formally executed by Rollins and CSI on February 10.

C. Site Maintenance

A leaking drum and a leaking transformer were discovered during routine warehouse inspection. The leaks were reported to the EPA. Rather than call out OH Materials, our emergency response contractor, we used local workers for cleaning up the leaks. The operation took 13 manhours and cost \$520. This is about \$2000 less than the OHM estimate for doing the work.

D. RI/FS Work Plan

The draft RI/FS Work Plan was reviewed and approved by the Technical Subcommittee during January. The Legal Subcommittee and the Steering Committee also reviewed the document. It was submitted to Steve Kinser on January 26, one day ahead of the schedule specified in AO II. The EPA is currently reviewing the plan and we anticipate their first feedback in the latter half of February.

III. Allocation Issues

Key allocation issues which impact the removal operation were resolved in several conference calls. The Technical Subcommittee agreed to recommend to the Steering Committee that the identified waste belonging to Buyout parties would not be distributed to the Buyin parties but would become unidentified instead. This will not affect the record keeping for the

removal since the Buyout parties will not be known in time, but it will make the accounting and allocation chores simpler.

It was agreed that it will not be necessary to accurately measure the liquid contained in transformers nor to measure the flush liquid. However, Rollins has subsequently decided that it will be easier for them to purchase meters than to estimate the volumes. In either case it will be necessary to reconcile those volumes to the weight of liquid leaving the site, and Rollins is developing their system to do that material balance.

IV. Forecast of Site Activities for February

Rollins began to mobilize for the removal on February 11. They expect to spend the rest of the month getting ready to begin the removal, now targeted for March 1.

The RI/FS Work Plan is currently being reviewed by the EPA. We expect to meet with Steve Kinser in late February to receive his initial comments. Once the plans are approved by the EPA, CSI will issue the Request for Proposal document to the selected bidders. However, that probably will not occur in February.

Martha C. Rose Chemicals Site
Fact Sheet #6
January 26, 1988

Background*

- o An administrative order on consent was signed October 29, 1987, for the removal of approximately 13.5 million pounds of materials contaminated by polychlorinated biphenyls (PCBs) abandoned by the Martha C. Rose Chemicals Co. at its processing facility in Holden, Mo. The agreement was reached by the Environmental Protection Agency and 16 of the parties that had sent PCBs to the site for processing.
- o The cleanup will be conducted by the Rose Chemicals Steering Committee, which includes the 16 companies that signed the administrative order on consent. In addition, more than 700 companies and other institutions, such as hospitals and municipalities, also sent PCBs to the site. The Steering Committee is chaired by Jene L. Robinson, manager for environmental affairs, Illinois Power Co., Decatur, Ill.
- o Starting August 1987, liquids containing PCBs have been removed from the site for incineration at an EPA authorized facility in Coffeyville, Kan. More than 1.3 million pounds (or 165,000 gallons) of liquids containing PCBs have been removed.

*Fact sheet with additional background on Rose is available.

Plan to Remove the PCBs

- o The cleanup is expected to begin after EPA approves a detailed plan for the removal and destruction of the contaminated material. The cleanup will meet all applicable federal laws.
- o According to the work plan, PCB transformers are to be drained and flushed to remove as much PCB contamination as possible and then shipped to a landfill in Alabama that is fully approved by federal and state governments to accept PCBs.
- o Fluids and capacitors are to be sent to an incinerator in Texas, which is licensed by EPA to burn PCBs.
- o The work plan calls for approximately six truckloads of contaminated materials to leave the site daily. All contaminated materials will be fully covered or containerized during shipping. (over)

- o Preliminary studies performed over the last 10 months have concluded that PCB contamination of the property is localized in the area of the two buildings on site. These testing results are available at the Holden City Hall. Some of this soil will be placed in containers and shipped to the Alabama landfill.
- o The removal is estimated to take about seven to eight months.
- o While the PCBs are being removed, a study will be conducted to determine the extent of any residual contamination that may remain on the property after the PCB-contaminated materials have been removed. The study will outline a plan for reducing to safe levels any residual contamination. The cleanup options outlined in the study would be the subject of future negotiations by the parties and the government and any agreed to remedy would be contained in a future administrative order or consent decree.
- o Security at the site will continue throughout the removal.
- o EPA will oversee the cleanup to ensure it meets all state and federal standards. EPA's on-scene coordinator for the site is Steve Kinser, EPA Region VII, Superfund Branch, 726 Minnesota Ave., Kansas City, Kan. 66101 (913) 236-2856.
- o Information on the site, including the final work plan, the October administrative order, fact sheets, and the sampling data, will be located in a repository at the Holden City Hall. To look at the documents or copy them for a charge, contact Ms. Sheila Spies, City Clerk, 101 W. 3rd St., Holden, Mo. 64040; (816) 732-4811.

Clean Sites has helped plan the cleanup, co-ordinate it with the settlement, and will be managing the removal of PCBs from the site. Clean Sites, Inc., is a non-profit, independent organization established to accelerate voluntary cleanups of hazardous waste sites.

Contacts:

Robin Robinson, CSI Project Manager, can be contacted on site in Holden, Mo., at (816) 732-5529.

Joan Ebzery, CSI Director, Public Affairs, can be contacted at CSI headquarters in Alexandria, Va., (703) 683-8522.



CLEAN SITES INC

1199 NORTH FAIRFAX STREET / ALEXANDRIA VIRGINIA 22314 / 703-683-8522

TELECOPIER NO. 703-548-8773

MIDWEST REGIONAL OFFICE: 1400 E. TOUHY AVENUE / SUITE 215 / DES PLAINES, IL 60018 / 312-635-7580

Press Advisory

Removal is set to begin of both the liquid and solid materials contaminated by polychlorinated biphenyls (PCBs) that were abandoned at the now defunct Martha C. Rose Chemicals Company's processing plant in Holden, Mo.

The materials are scheduled to begin leaving the site on or near March 7. Liquids containing PCBs will be sent to an incinerator in Texas, which is licensed by the Environmental Protection Agency to burn PCBs. The incinerator is owned by Rollins Environmental Services (FS) Inc. Solid materials will be sent to an approved landfill in Emelle, Ala., owned by Chemical Waste Management Inc.

Further details about the site and the cleanup are on the enclosed fact sheet.

For more information, contact Joan Ebzery at (703) 739-1275 or Robin Robinson at (816) 732-5529.



CLEAN SITES INC

PO BOX 216 / HOLDEN MISSOURI 64040 / 816-732-5529 / 816-732-6357

April 15, 1988

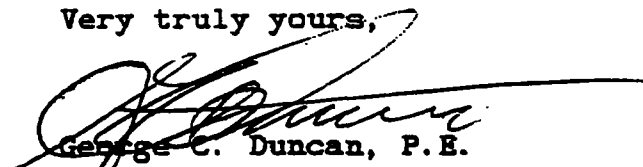
**Mr. Steven E. Kinser
Regional Project Manager
U.S.E.P.A.
Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101**

**SUBJECT: EPA Site Status Report No. 5
(AOC 87-F-0007)
Rose Chemical Site**

Dear Steve:

The EPA Site Status Report for the Rose Chemicals Site at Holden, Missouri, is attached. This report covers progress during March, 1988.

Very truly yours,


**George C. Duncan, P.E.
Construction Manager,
for Robin J. Robinson**

RJR/clc

Enclosures

**cc: Mr. George Hess
U.S.E.P.A.
Region VII
25 Funston Road
Kansas City, KS 66115**

PROGRESS REPORT NO. 5
(AOC 87-F-0007)

ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR MARCH, 1988

HIGHLIGHTS

- o Rollins completed the mobilization of staff, equipment and temporary facilities on March 8.
- o The first Rollins truck, loaded with crated capacitors, left the site for Deer Park, Texas on March 8.
- o The contents of the "bag room" and the dumpster have been crated and removed from the site.
- o Air monitoring of the dust levels inside the warehouses has been continuous from the start of removals. Readings have been normally 10% or less of the OSHA Permissible Exposure Limit for PCBs.
- o 4.2 million pounds of PCB materials were removed from the site in March.

PROJECT PROGRESS REPORT NO 5
(AOC 87-F-0007)

ROSE CHEMICALS SITE - HOLDEN, MO.

STATUS FOR MARCH, 1988

I. SITE ACTIVITIES

A. REMOVAL

1. MOBILIZATION

Rollins completed their mobilization on March 8, roughly one week behind schedule. They were slow in setting up the air and personnel monitoring equipment and they failed to install the computer system as early as planned.

2. START-UP

The first truck left the site at 5:30 pm on March 8. Start-up problems were minimal and by the second day Rollins's two crews has settled into a smooth routine with weighing, recording, and loading proceeding rapidly. The first material to be removed was crated capacitors.

3. DATA RECORDING

Rollins's computer system is partially complete; however, it is sufficient to document accurately the materials being removed from the site. Rollins continues to work on upgrading the system to bring it to the level specified in our contract. Each of the two warehouse computers as presently configured contains the entire Rose data base. To begin a new load the operator first enters the truck number and the truck weight limit. Then, when an item is placed on the scale, an article number is typed in and the inventory data appears on the screen. The operator then enters the weight of the article from the scale's digital read-out, and finally, the code for material type. When a truck is fully loaded, the operator prints out a list of the truck's contents which gives article number, weight, and material type. This printout is attached to the Hazardous Waste Manifest.

Features of the computer system which Rollins is still developing are (1) connection of the barcode scanner to the computer, (2) the procedure to split items into two or more parts, (3) a number of reports useful in controlling the job, (4) an update of the "FBI List", (5) a means for preparing floppy disks for CSI use, (6) a subroutine for dealing with drummed liquids and transformers. Rollins's consultant has promised these enhancements by early April.

4. QUALITY ASSURANCE

CSI monitored 100% of the weighing and recording operation for the first several loads. Once we established that Rollins's equipment was working properly and that no significant errors were being made, we reduced the level of monitoring to approximately 10%. In order to verify the accuracy of the two scales, we have prepared a standard barrel which is weighed on both scales on a daily basis.

5. SEQUENCE OF WORK

Rollins began the removal with crated capacitors. The crates were easy to handle and by getting them out of the way early, working space was created quickly. (They are also the next to highest priced item on the list.)

Following the crated capacitors, Rollins moved into the "bag room" where the bags of capacitors were placed by hand into wooden crates built for the purpose. Fortunately, the bags were not wet, and the work proceeded smoothly. The bag room, now empty, contained 1.2 M lbs, about 9% more than estimated. The level of PCB-contaminated dust in the bag room was only 30% of the Permissible Exposure Limit.

After emptying the bag room, Rollins moved to the Dumpster which contained shredded capacitor cores. A hole was cut in the side of the dumpster and the Bobcat - a small wheeled vehicle with a hydraulically operated bucket - was used to pick up the material and dump it into a crate. The dumpster is now empty. It contained 232 K lbs, 17% more than estimated.

As of April 1, Rollins was preparing to crush empty drums and to load drummed liquids.

6. HEALTH AND SAFETY

Rollins has conducted daily safety meetings from the start of the job. To date there have been no lost time accidents on the site.

Each driver is briefed and goes through a written check list prior to leaving the site. The briefing ensures familiarity with the trucking company's Emergency Plan in case of an accident. To date no accidents have happened.

Rollins has monitored air quality inside the warehouses from the beginning of the removal. Organic vapor, oxygen, dust and PCB content are measured. To date the highest PCB reading was obtained in the bag room. That reading was only 30% of the PEL. Other readings were normally 10% or less.

Dust level has been quite low (0.32 mg/m³). Rollins vacuums the floor in the work areas twice a week on average. To date over 4 barrels of dust has been picked up. That's about 550 lbs.

B. REMOVAL LOG

CSI is maintaining a log - separate from Rollins - which records the article number, weight, and material type for every item as it is removed. The log is divided by truck manifest number. Tables 1, 2, and 3, give the summary information taken from that log. As the removal proceeds, the new data will be supplied to CSI-Alexandria for use in allocation and accounting. The tables are almost self-explanatory. Note, however, that in the case of crated capacitors the inventory excluded the weight of the crates (assumed to be 264 lbs. each). The Delta column has been adjusted to reflect that fact.

Space is provided in the removal log to record the date on which each Certificate of Destruction (or Disposal) is received by CSI. Our tracking system is designed to flag manifest where CD's have not been received within 30 days of the material leaving the site. Since our agreement with EPA calls for disposal or destruction within 60 days, the 30-day flag allows enough time to alert Rollins to an impending problem and for them to begin checking the status of the material.

At the end of March approximately 4.2 M lbs. had been removed. The total is broken down into 3.8 M lbs of Capacitors, and 0.4 M lbs. of Bulk Liquid. The totals match the inventory values very closely. Solids removed during March were greater than the inventory weights by 191,000 lbs. or 4.3%. We don't have a good comparison for liquids, but there is some evidence that total liquids on site may be roughly 200,000 lbs. less than shown in the inventory. Thus, the overall balance would be almost exact. All of this material was shipped to Rollins's Deer Park, Texas incinerator on the outskirts of Houston.

It is important to note that the rapid rate of removal in March is expected to slow down as we move into handling drummed liquids and transformers. Through March we were dealing with crated solids which can be handled more rapidly than is possible with liquid in drums. Our forecast for April is that another 2 M lbs. will be removed.

C. FBI DOCUMENTATION

The FBI visited the site on four occasions during March to take photographs of specific items prior to their removal from the Rose site. Jane Mason, FBI Special Agent, has photographed a total of 144 articles to date. Most of these articles were not attributed to any generator in our inventory. However, a small number were shown as having been sent by a Rose PRP.

So far, the FBI program has caused minimal interference with the removal work. When an "FBI item" is found by the forklift driver, it is moved to a staging area. Periodically, Ms. Mason comes to the site and photographs the items collected. Then she releases the material for shipment. In early April, the FBI provided CSI with a new list of 516 articles to replace the original list of 1,700. This information has been added to the Rose data base so that if one of those article numbers is punched into the computer, a message flashes on the screen identifying that article as on the FBI list. This alerts the operator to check to see if the FBI has taken the photograph and released the article for shipment off-site. Nothing has slipped through the net so far.

D. SOIL REMOVAL

Rollins has been asked to prepare a plan for removing a 20 inch layer of soil from areas where earlier sampling indicated PCB concentrations greater than 25 ppm. Due to the press of other work, Rollins has not yet provided that plan. However, it is anticipated that it will be received early in April.

E. INCINERATOR AUDIT

Lester Burris and Robin Robinson visited Rollins's Deer Park incinerator facility on March 31. The physical facilities were inspected briefly, but the audit concentrated on the material tracking procedure. The Rollins recording system is satisfactory. It is a "well thought out", computerized system with a lot of manual checking and redundancy. The only apparent problem is that the system does not track the destruction of the containers after the contents have been dumped into the shredder. Rollins management promised to rectify that problem for the Rose material.

The new incinerator was said to be operating at full capacity. However, there is a significant backlog of material, both liquid and solid, waiting to be burned. Because of that backlog, a 4 tanker/week limit of liquid from Rose is being imposed by Deer Park for the month of April.

F. RI/FS WORK PLAN

Steve Kinser gave CSI his written response to the draft Work Plan on March 23. In general, the EPA saw no issues which presented "significant problem(s) in resolving". However, they did have a number of detailed comments which must be addressed. Copies of his letter have been distributed to ERT and key members of the Steering Committee, Technical Subcommittee and Legal Subcommittee. A meeting is scheduled in Chicago on April 11 to draft a response.

We will also discuss the Request for Proposal for the RI/FS contract at that meeting.

II. FORECAST OF SITE ACTIVITIES FOR APRIL

Rollins is expected to complete the computer system and have all operators trained by the end of April.

Removal of drummed and crated solids will begin. This material will be shipped to the Chemical Waste Management Landfill in Emelle, Alabama.

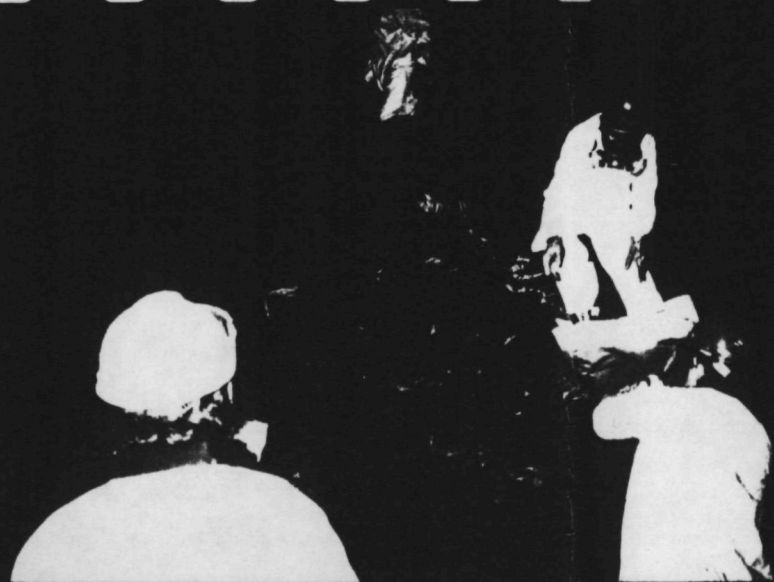
Rollins will begin transferring liquid from drums into bulk tankers for shipment to the incinerator.

Questions raised by the EPA regarding the RI/FS Work Plan draft will be discussed, first within the Rose Technical Subcommittee, and then with Steve Kinser.

A truck tire washing station will be fabricated and installed on site. This station will not be needed until trucks begin going into the warehouse to pick up transformers. Work with transformers is not anticipated during the month of April.

SITE PROBLEMS

Rollins's Deer Park incinerator is currently heavily loaded and they have limited shipment of liquids from the site to four tankers per week. This limitation should be removed by the end of April. If not, it would become a major bottleneck.



BAG ROOM REMOVALS



JANE MASON OF THE FBI AND GEORGE DUNCAN (MASON IS ON THE RIGHT)



ROLLINS CHECKING DRUM CONTENTS



FIRST TRUCK TO LEAVE THE SITE



REMOVALS FROM THE BAG ROOM



LOADING AREA FOR ENCLOSED VANS

TABLE 1

CRATED CAPACITORS

DATE	MAN NO (NEW)	WEIGHT AGREED	INVENTORY					
			WT LBS	DELTA LBS	%	CRATES	DRUMS	BAGGED
03/06/88	SUBTOTAL S2	43,772	41,327	(1,515)	-3.5	15	0	S2
03/08/88	SUBTOTAL S1	38,278	35,287	(177)	-0.5	12	26	S1
03/08/88	SUBTOTAL S3	42,256	38,186	110	0.3	19	0	S3
03/09/88	SUBTOTAL S4	42,334	37,793	(475)	-1.1	18	0	S4
03/09/88	SUBTOTAL S5	44,616	39,653	211	0.5	16	0	S5
03/09/88	SUBTOTAL S7	43,276	38,518	534	1.2	15	0	S7
03/09/88	SUBTOTAL S6	41,712	37,053	697	1.7	17	0	S6
03/10/88	SUBTOTAL S8	40,196	35,318	390	1.0	17	0	S8
03/10/88	SUBTOTAL S11	43,726	39,062	176	0.4	18	0	S11
03/10/88	SUBTOTAL S9	43,312	41,284	(324)	-1.2	16	0	S9
03/10/88	SUBTOTAL S10	41,504	37,935	(655)	-1.6	16	0	S10
03/10/88	SUBTOTAL S13	42,790	38,807	(241)	-0.6	16	0	S13
03/10/88	SUBTOTAL S12	44,794	40,723	(417)	-0.9	17	0	S12
03/10/88	SUBTOTAL S15	42,292	37,159	909	2.1	16	0	S15
03/10/88	SUBTOTAL S14	44,312	39,591	(31)	-0.1	18	0	S14
03/10/88	SUBTOTAL S17	41,618	37,827	93	0.2	14	0	S17
03/10/88	SUBTOTAL S16	40,535	35,002	781	1.9	18	0	S16
03/10/88	SUBTOTAL S19	44,230	39,802	(324)	-0.7	18	0	S19
03/10/88	SUBTOTAL S21	44,766	40,329	213	0.5	16	0	S21
03/10/88	SUBTOTAL S18	43,888	39,576	(176)	-0.4	17	0	S18
03/10/88	SUBTOTAL S20	42,990	39,427	(1,189)	-2.8	18	0	S20
03/11/88	SUBTOTAL S23	43,094	40,102	(241)	-0.1	19	0	S23
03/11/88	SUBTOTAL S22	43,798	36,601	(207)	-0.5	20	0	S22
03/11/88	SUBTOTAL S25	43,866	39,659	(17)	0.0	16	0	S25
03/12/88	SUBTOTAL S24	43,986	40,241	(743)	-1.7	17	0	S24
03/14/88	SUBTOTAL S26	43,008	38,684	(164)	-0.4	17	0	S26
03/14/88	SUBTOTAL S28	44,598	42,383	(1,745)	-3.9	15	0	S28
03/14/88	SUBTOTAL S27	42,356	39,359	(366)	-0.9	10	54	S27
03/14/88	SUBTOTAL S30	43,276	38,727	61	0.1	17	0	S30
03/14/88	SUBTOTAL S29	43,260	41,880	(1,524)	-3.5	11	38	S29
03/15/88	SUBTOTAL S32	43,348	39,466	978	2.3	11	60	S32
03/15/88	SUBTOTAL S34	42,302	37,874	1,524	3.6	11	53	S34
03/15/88	SUBTOTAL S31	41,668	43,425	(1,757)	-4.2	0	172	S31
03/16/88	SUBTOTAL S33	43,966	41,119	207	0.5	10	58	S33
03/16/88	SUBTOTAL S36	42,196	38,753	(781)	-1.9	16	0	S36
03/17/88	SUBTOTAL S35	43,186	40,602	(320)	-0.7	11	55	S35
03/17/88	SUBTOTAL S38	42,706	38,239	771	1.8	14	32	S38
03/17/88	SUBTOTAL S37	42,326	39,984	(826)	-2.0	12	53	S37
03/17/88	SUBTOTAL S40	42,210	38,260	1,310	3.1	10	55	S40
03/18/88	SUBTOTAL S42	43,022	39,206	356	1.3	8	66	S42
03/18/88	SUBTOTAL S39	41,416	37,373	83	0.2	15	36	S39
03/18/88	SUBTOTAL S41	43,344	38,371	(43)	-0.1	19	43	S41
03/18/88	SUBTOTAL S44	43,013	38,313	1,398	3.7	11	63	S44
03/19/88	SUBTOTAL S43	43,386	39,329	1,153	2.7	11	66	S43
03/22/88	SUBTOTAL S46	42,068	38,686	478	1.1	11	57	S46
03/22/88	SUBTOTAL S48	43,992	40,771	53	0.3	12	60	S48
03/22/88	SUBTOTAL S50	43,094	37,854	2,336	5.4	11	47	S50
03/24/88	SUBTOTAL S45	37,098	32,300	1,894	5.1	11	88	S45
03/31/88	SUBTOTAL S86	44,100	40,124	(1,040)	-2.4	19	0	S86
03/31/88	SUBTOTAL S87	39,994	34,932	(746)	-1.9	22	0	S87
03/31/88	SUBTOTAL S88	39,888	32,274	2,070	5.2	21	0	S88
LOADS								
GRAND TOTALS		2,181,164	1,974,752	3,161	0.14	753	1182	51

TABLE 2 BAG ROOM AND DUMPSTER

09-Apr-88

CONSOLIDATED SUMMARIES

DATE	RMM NO	WEIGHT	INVENTORY		DELTA		L	CRATES	DRUMS	BAGGED	
			WT		LBS	LBS					
		LBMT	LBMT	LBS	LBS						
03/22/88	SUBTOTAL	532	33,088		0	0.0	0	0	18	532	
03/22/88	SUBTOTAL	534	33,312		0	0.0	0	0	18	534	
03/22/88	SUBTOTAL	547	40,118		0	0.0	0	0	17	547	
03/24/88	SUBTOTAL	549	42,214		0	0.0	0	0	19	549	
03/24/88	SUBTOTAL	558	37,788		0	0.0	0	0	19	558	
03/24/88	SUBTOTAL	558	44,196		0	0.0	0	0	19	558	
03/24/88	BAGGED	560	23,522		0	0.0	0	0	18	560	
03/24/88	BAGGED	582	38,488		0	0.0	0	0	13	582	
03/24/88	SUBTOTAL	564	44,483		0	0.0	0	0	17	564	
03/24/88	SUBTOTAL	551	45,384		0	0.0	0	0	16	551	
03/24/88	SUBTOTAL	553	43,778		0	0.0	0	0	13	553	
03/25/88	SUBTOTAL	555	44,056		0	0.0	0	0	13	555	
03/25/88	SUBTOTAL	557	43,730		0	0.0	0	0	13	557	
03/26/88	SUBTOTAL	559	42,218		0	0.0	0	0	13	559	
03/26/88	SUBTOTAL	561	43,284		0	0.0	0	0	16	561	
03/26/88	SUBTOTAL	563	43,108		0	0.0	0	0	18	563	
03/28/88	SUBTOTAL	565	44,388		0	0.0	0	0	19	565	
03/28/88	SUBTOTAL	566	43,808		0	0.0	0	0	18	566	
03/28/88	SUBTOTAL	567	43,154		0	0.0	0	0	17	567	
03/28/88	SUBTOTAL	568	44,632		0	0.0	0	0	19	568	
03/28/88	SUBTOTAL	569	43,290		0	0.0	0	0	18	569	
03/28/88	SUBTOTAL	570	44,413		0	0.0	0	0	18	570	
03/28/88	SUBTOTAL	571	42,808		0	0.0	0	0	18	571	
03/29/88	SUBTOTAL	572	43,960		0	0.0	0	0	18	572	
03/29/88	SUBTOTAL	573	44,448		0	0.0	0	0	18	573	
03/29/88	SUBTOTAL	574	43,332		0	0.0	0	0	18	574	
03/29/88	SUBTOTAL	575	43,580		0	0.0	0	0	18	575	
03/29/88	BAGGED	576	33,540		0	0.0	0	0	14	576	
03/30/88	BAGGED	581	2,134		0	0.0	0	0	1	581	
LOADS											
GRAND TOTAL BAG ROOM		1,180,642	1,020,000	140,642	8.7	0	0	478	27		
			37,600	-CRATE WT	DELTA I						

MIXED LOADS

03/29/88	CAPS	588	19,438	17,733	(213)	-13.9	0	0	8	588
03/24/88	CAPS	562	28,380	18,696	(44)	-0.2	0	0	7	562
03/30/88	CAPS	579	22,812	18,387	2,732	12.1	13	0	0	579
03/30/88	CAPS	580	23,338	17,887	4,187	17.3	13	0	0	580
03/30/88	CAPS	581	24,342	27,199	(7,607)	-31.3	18	0	0	581
03/31/88	CAPS	583	26,744	24,604	(300)	-1.1	10	0	0	583
03/31/88	CAPS	584	23,288	23,117	(371)	-1.3	0	0	14	584
03/30/88	CAPS	585	31,698	27,701	(491)	-1.5	17	0	0	585
LOADS										
GRAND TOTAL MIXED LOADS		193,156	177,112	(2,107)	-1.08	73	0	29	5	

DATE	RMM NO	WEIGHT	INVENTORY						
			WT	DELTA					
			(LBS)	(LBS)	L	CRATES	DRUMS	BAGS	
03/30/88	DUMPSTER	576	11,678	0	0.00	0	0	1	576
03/30/88	SUBTOTAL	577	43,720	0	0.00	0	0	20	577
03/31/88	SUBTOTAL	578	44,376	0	0.00	0	0	21	578
03/30/88	DUMPSTER	579	21,366	0	0.00	0	0	10	579
03/30/88	DUMPSTER	580	19,646	0	0.00	0	0	9	580
03/31/88	SUBTOTAL	582	42,192	0	0.00	0	0	20	582
03/31/88	DUMPSTER	581	2,134	0	0.00	0	0	8	581
03/31/88	DUMPSTER	583	16,282	0	0.00	0	0	8	583
03/31/88	DUMPSTER	584	17,882	0	0.00	0	0	3	584
03/30/88	DUMPSTER	585	12,624	0	0.00	0	0	6	585
04/06/88	DUMPSTER	592	2,044	0	0.00	0	0	1	592
04/06/88	DUMPSTER	594	2,140	0	0.00	0	0	1	594
LOADS									
GRAND TOTAL DUMPSTER		236,104	187,000	49,104	16.73	0	0	114	3
			9,120	-CRATE WT	DELTA L				

SUMMARY GRAND TOTALS

1,391,902 1,384,112 187,439 11.79

608 37

TABLE 3 BULK LIQUIDS

REMOVAL LOG - BULK LIQUIDS			
DATE	MAN NO (NEW)	NET WT LBS	APPROX VOL GAL
03/19/88	L1	39,300	4,718
03/19/88	L2	41,330	4,964
03/22/88	L3	36,520	4,384
03/24/88	L4	42,090	5,053
03/22/88	L5	44,040	5,287
03/22/88	L6	44,580	5,352
03/30/88	L7	44,950	5,396
03/31/88	L8	40,540	4,867
03/31/88	L9	45,040	5,407
GRAND TOTAL BULK L19		378,410	45,427



CLEAN SITES INC

1199 NORTH FAIRFAX STREET / ALEXANDRIA VIRGINIA 22314 / 703-683-8522
TELECOPIER NO. 703-548-8773
MIDWEST REGIONAL OFFICE: 1400 E. TOLUAY AVENUE / SUITE 215 / DES PLAINES, IL 60018 / 312-635-7580

Received
5/24/88

May 16, 1988

Mr. Steven E. Kinser
Regional Project Manager
U.S.E.P.A.
Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101

SUBJECT: EPA SITE STATUS REPORT NO. 6
(AOC 87-F-0007)
ROSE CHEMICALS SITE

Dear Steve:

The EPA Site Status Report for the Rose Chemicals Site at Holden, Missouri, is attached. This report covers progress during April, 1988.

Very truly yours,

Robin J. Robinson
CSI Project Manager

RJR/sjr

Enclosures

cc: Mr. George Hess
U.S.E.P.A.
Region VII
25 Funston Road
Kansas City, KS 66115

COPY

PROJECT PROGRESS REPORT NO. 6
(AOC 87-F-0007)

ROSE CHEMICALS SITE - HOLDEN, MD.

STATUS FOR APRIL, 1988

I. SITE ACTIVITIES

A. REMOVAL

1. MATERIAL MOVEMENT

The removal work continued to go smoothly and ahead of schedule during April. Cumulatively, 6.7 Mlbs. of material has left the site. Rollins completed shipping capacitors to the Deer Park incinerator except for a few crates which are being held intentionally until later in the removal work when we can be sure that random containers of capacitors won't turn up which would require sending an almost empty truck to Texas.

The March shutdown of the incinerator, discussed last month, created a significant backlog of material (both liquid and solid) waiting in Deer Park to be burned. For that reason Rollins limited liquid off-take during April to only 10 loads. We have been informed, however, that during May we will be able to send six tankers per week of Rose liquids. Most of the liquid removed during April came from outside bulk tanks, all of which are now empty. All the inside bulk tanks are empty with the exception of five large tanks in the pit in the process area. We will not empty those tanks until the water has been removed from the pit to avoid risking floating the tanks. A comparison of the weight of liquid removed from the bulk tanks to the Chemical Waste Management (CWM) inventory indicates that there is approximately 160 Klbs. less liquid than anticipated.

During April Rollins began shipping containerized soil and debris to the Chemical Waste Management landfill in Emelle, Alabama. A problem arose when we discovered some of the crates and barrels were only partially filled. The landfill regulations prohibit landfilling containers that are less than 90% full. The regulations are designed to minimize subsidence. The problem was solved in two ways. For some of the crates we cut off the top portion, placed the scrap wood inside the crate, and nailed the top back on. In other cases we filled the partially empty crates or drums with debris. If the container was an "identified" item, we first weighed it in its original condition, then added material, and then re-weighed. In this manner we ensured that the PRP involved will only pay for it's identified waste. Since this activity is beyond the scope of the contract, Rollins has requested a change order for the additional labor involved in re-packing or modifying the crates.

A second problem encountered in shipping material to Emelle was the use of enclosed vans for transporting debris. There is a large amount of scrap metal at the Rose site. When this material is placed in a van it is virtually impossible to tie it down. This creates a risk on the road and during unloading. Some of the first vans shipped to Emelle arrived with damaged sides caused by the shifting load, and personnel at the landfill complained about the hazard of trying to unload the material in that condition. Therefore, CSI has obtained authorization from EPA to use flatbed trucks for transporting debris which has not been in contact with PCB liquids. The method used is as follows: a flatbed is double-lined with visqueen; the scrap material is then placed on the flatbed and strapped down either with chain or plastic straps; the visqueen cover is then wrapped in place; and finally, a tarp is placed over the entire load. The flatbed has solid wooden sides to a height of 4 feet. The load does not extend above the 4 foot sides. We feel that this method of transportation is significantly safer than the use of vans and is equally effective in preventing the escape of dust during transportation.

All the drums in the south warehouse were crushed during April. The south warehouse is now essentially empty except for the 1924 Bentley, the empty bulk tanks, and a small number of drums being held for possible later use.

The total amount of solid material removed to date amounts to approximately 6.1 Mlbs. Most of this material has come out of the main warehouse which is now looking cavernous. The attached map shows in dark shading the areas that have been emptied. One can now stand in the main aisle and see all the way from the east end of the building to the west.

We have visually inspected the floors in both warehouses in a number of areas. It is heavily stained in a number of places, but it does not appear to be badly cracked.

2. DATA RECORDING

Rollins's computer system is still not complete. Just like last month, their consultant has promised to finish the enhancements in the next two weeks. Rollins has concluded that at this stage of the work the use of the barcode scanner will not be worth the effort required to hook it up. Therefore, they have stopped work on that aspect of the system. However, the computer software has been improved, flagging of the new FBI list has been done, and a subroutine for handling drummed liquid has been completed. We are still waiting for documentation of the system and for the capability to transfer data from Rollins's computer to the CSI computer via floppy disks. The consultant is also working to build extra safeguards into the system to prevent double entries of data, a problem which can occur since the two warehouse computers are completely independent.

3. CERTIFICATES OF DESTRUCTION

Due to the shutdown of the Rollins incinerator in March, there is currently a significant quantity of unburned Rose material in Deer Park. We have reminded Rollins management of the requirement to provide CDs to CSI within 60 days of the material leaving the site. They assure us that they will be able to incinerate all material within that window. So far they have done so.

B. REMOVAL LOG

Total materials shipped during April was 2.7 Mlbs. As of April 29, 6.8 Mlbs. of material had been removed from the Rose site. The total is broken down into 4.2 Mlbs. of capacitors, 0.9 Mlbs. bulk liquid, and 1.7 Mlbs. soil and debris. The totals are still checking the inventory values fairly closely. Capacitors sent to the incinerator are 500 Klbs or 13% greater than the inventory weight. 350 klbs of this increase is crates which are being incinerated rather than being landfilled. Therefore the landfill weight will be lower by a like amount. Bulk liquids sent to the incinerator are 160 Klbs. or 7% less than the inventory. We do not have a reliable comparison of soil and debris at this time but expect the inventory weight to be low. Overall, the final amount of materials shipped should be within 10% of the inventory weight.

The removal quantities are presented graphically in Fig. 1. Based on the current Rollins outlook for incinerating liquids (6 tankers/week), we forecast mid-August as the date on which the removal will be finished. That 24-week schedule compares favorably with 31 weeks shown in the Work Plan. Bear in mind that paperwork and reporting will extend 2-3 months beyond that time.

C. FBI DOCUMENTATION

The FBI visited the site four more times during April to photograph the items on their new, "improved" list. As of early May, Jane Mason has photographed 254 of 515 items on the new list and 310 items on the original list. There is no backlog of material to be photographed and Jane has released for shipping all items which have been shot so far. The remaining articles appear to be transformers, some shredded cores, and drummed liquid which will be dealt with in the coming months.

D. BANKRUPTCY TRUSTEE MATERIAL

An agent for the Bankruptcy Trustee visited the site on April 28 to mark items in the warehouse which Stonitsch may wish to retain. Seventeen items were tagged. Stonitsch will get bids for decontaminating the items and then decide whether or not he wants to keep them. We are encouraging him to hold the list to a bare minimum and to reach a decision quickly so we can remove the rest under the current contract.

E. SOIL REMOVAL PLAN

Rollins submitted their soil removal plan to CSI in late April. That plan has now been expanded and submitted to the Technical Subcommittee for review. It is to be discussed at the upcoming Technical Subcommittee meeting in Kansas City on May 13. The plan is designed to minimize interference with the other aspects of the Rollins removal operation.

F. WATER DISPOSAL PLAN

A plan for disposing of decon water and the water in the pit in the process area has been established. Activated charcoal filtration units will be used to remove PCB contaminants from the water. The clean water will then be dispersed on the site in a way that will promote the growth of our site flowers. The dispersion area is the open field to the west of the main warehouse where no PCB work activities took place. The area will be uphill from the storm water runoff ponds to ensure that none of this water will leave the site. The plan has been discussed with representatives of the EPA and Missouri Department of Natural Resources who have informally endorsed the plan.

G. RI/FS WORK PLAN

A response to the EPA's comments on the RI/FS work plan has been prepared by ERI and distributed to members of the Technical & Legal Subcommittees for review. Technical comments will be discussed at the May 13 meeting in Kansas City. A final response to the EPA is targeted for later in May. After EPA review, we will schedule a face-to-face session to reach final agreement on the document.

H. HEALTH AND SAFETY

No lost time accidents occurred during April. To date the safety record is perfect. We are continuing daily safety meetings.

OSHA inspectors visited the site during April. They have not yet given us their report and plan to return in the near future to complete their inspection.

The full-time Rollins Health and Safety Officer was replaced at the end of April. As a result of early sampling work, we concluded that dust and PCB contamination was not a major problem at the site. Therefore, the amount of sampling has been significantly reduced. We will continue to have Health and Safety coverage by an on-site Rollins employee who will also handle administrative responsibilities on a part-time basis.

II. FORECAST OF SITE ACTIVITIES FOR MAY

Rollins will continue to remove debris from the site and could possibly begin washing and cutting the empty bulk tanks. All soil, debris, scrap, etc., will be shipped to the CWN landfill.

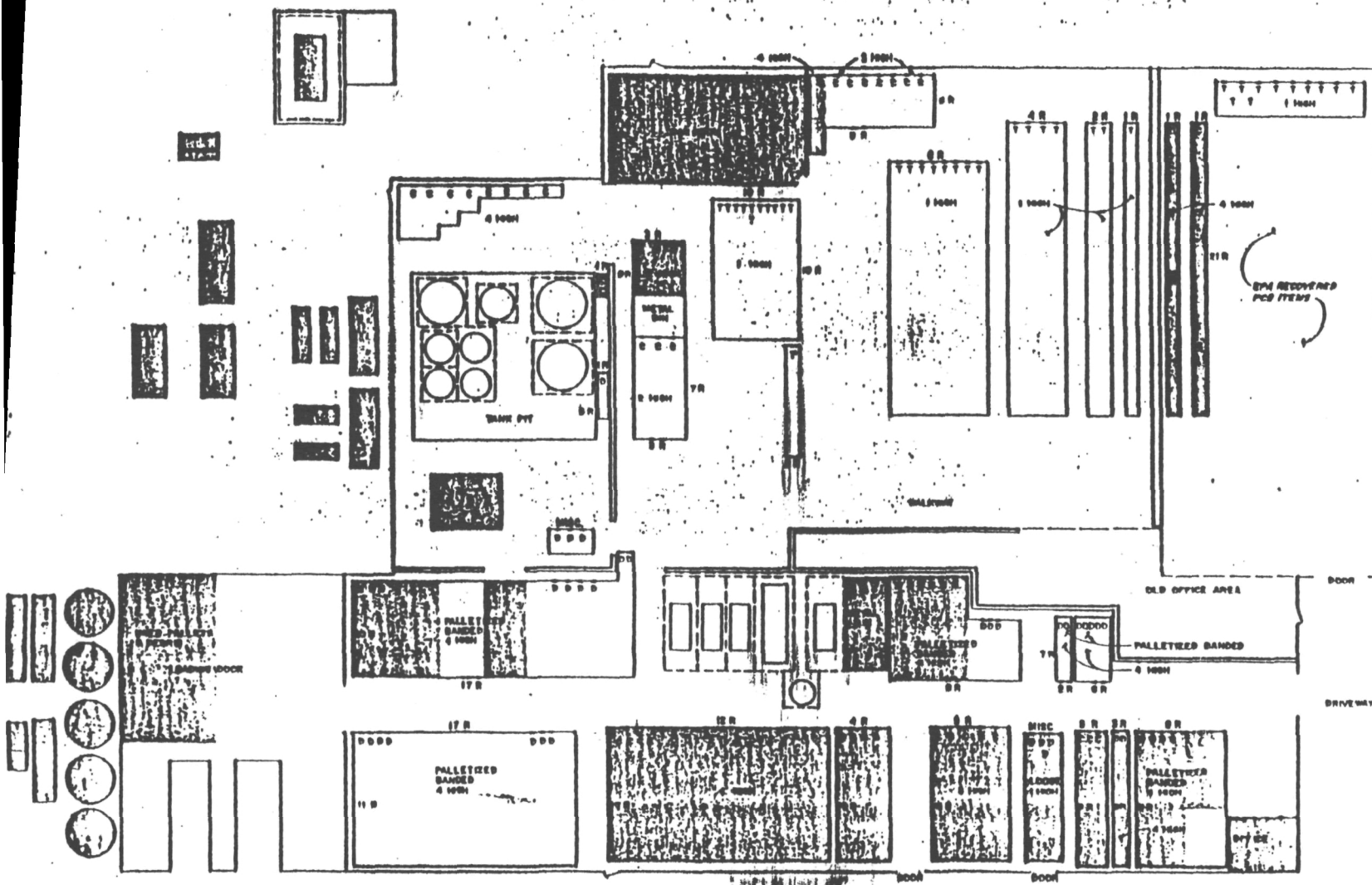
Removal of drummed liquids will begin in early May. Liquid will be pumped from the drums directly into tankers in most cases. However, if tanker availability becomes a problem, we will use one of the empty bulk tanks on the site as a temporary holding tank. Drums will be crushed for landfilling.

Transformer draining and flushing will begin in early May. Two tanks have been placed in a bermed area for use in this operation. One tank will be a holding tank for liquid drained from the transformers; the second tank will be used to hold the spent flush fluid (diesel oil).

We estimate approximately 2 Mlbs will leave the site during May, see Fig. 1.

We hope the Bankruptcy Trustee will soon be reaching a decision regarding any items on the site which he wishes to withdraw from the removal operations.

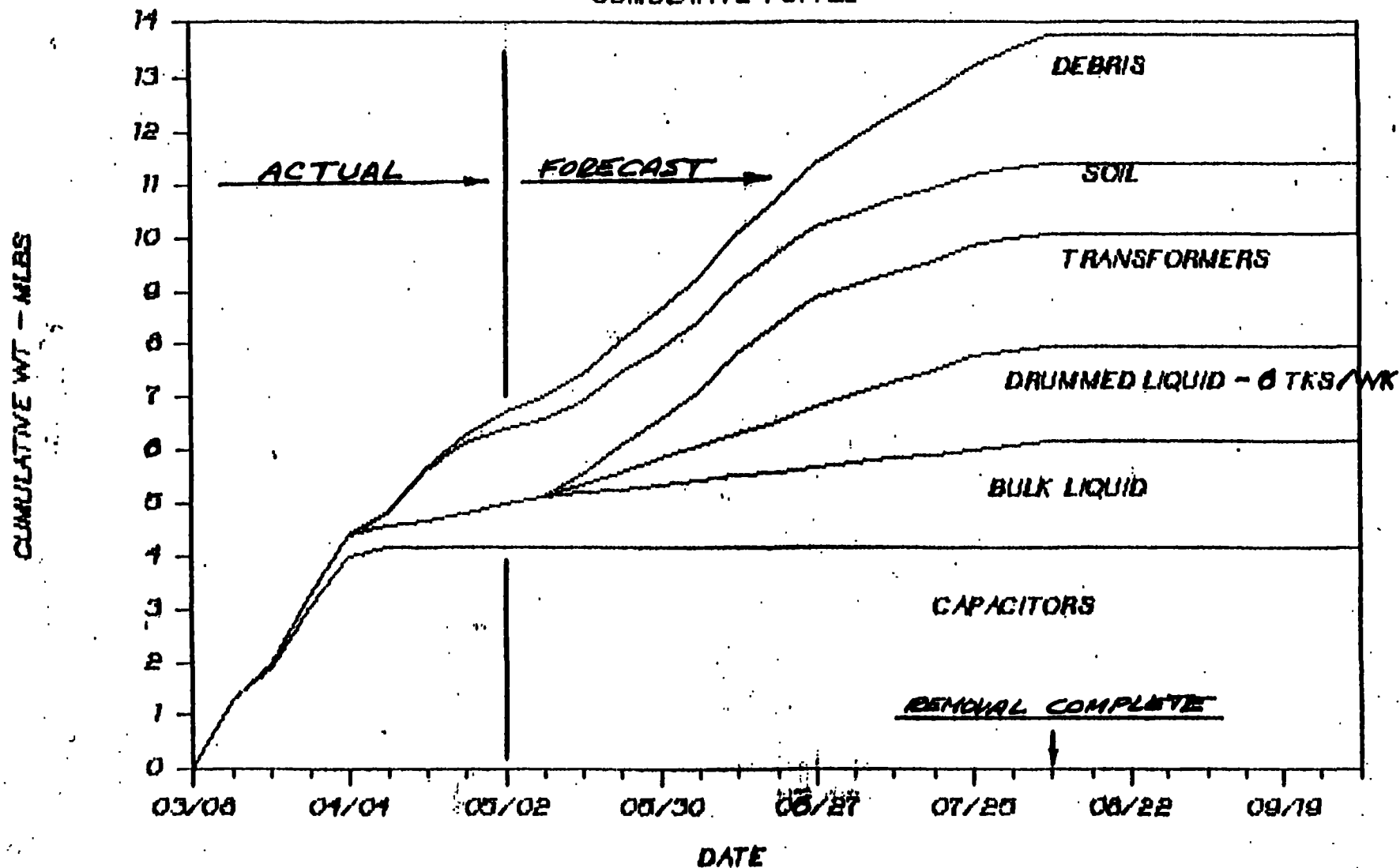
There will be a site visit by Technical Subcommittee members on May 12 and a Technical Subcommittee meeting the following day in Kansas City.



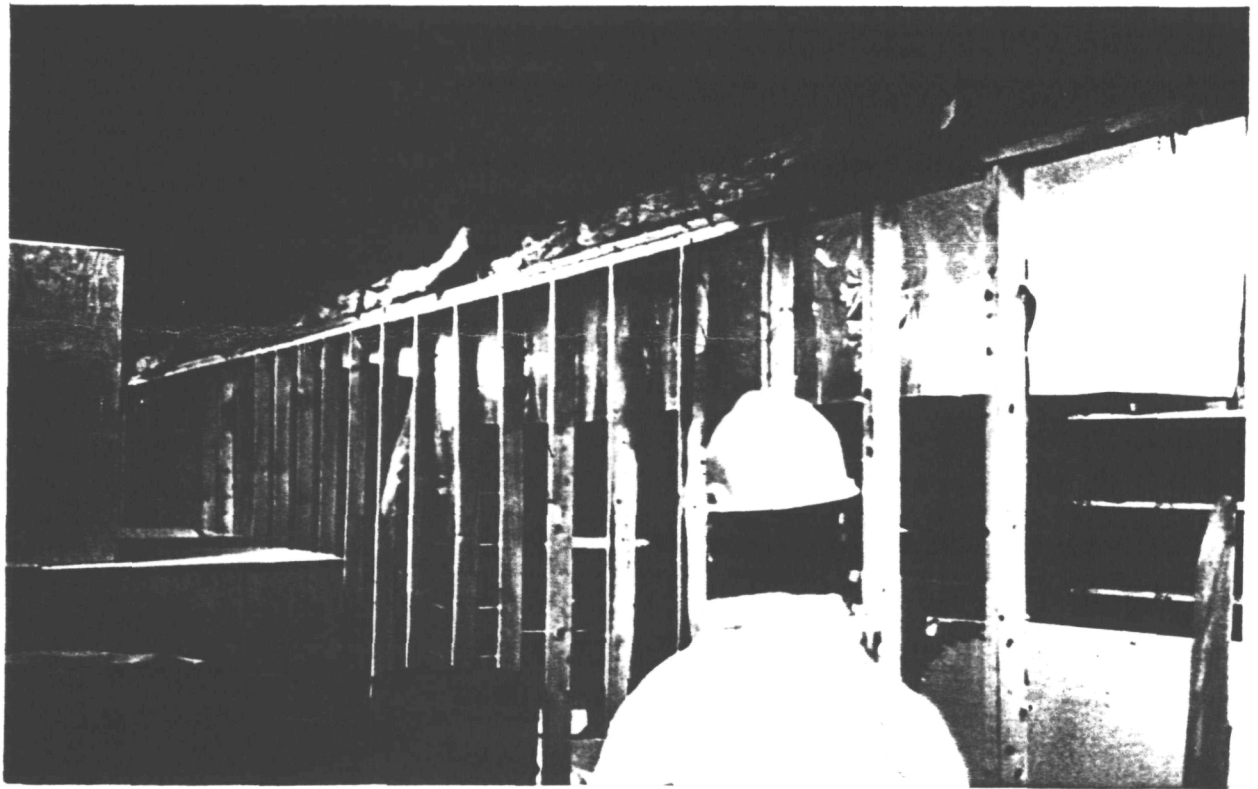
ROSE CHEMICAL COMPANY SITE

REMOVAL FORECAST

CUMULATIVE TOTALS



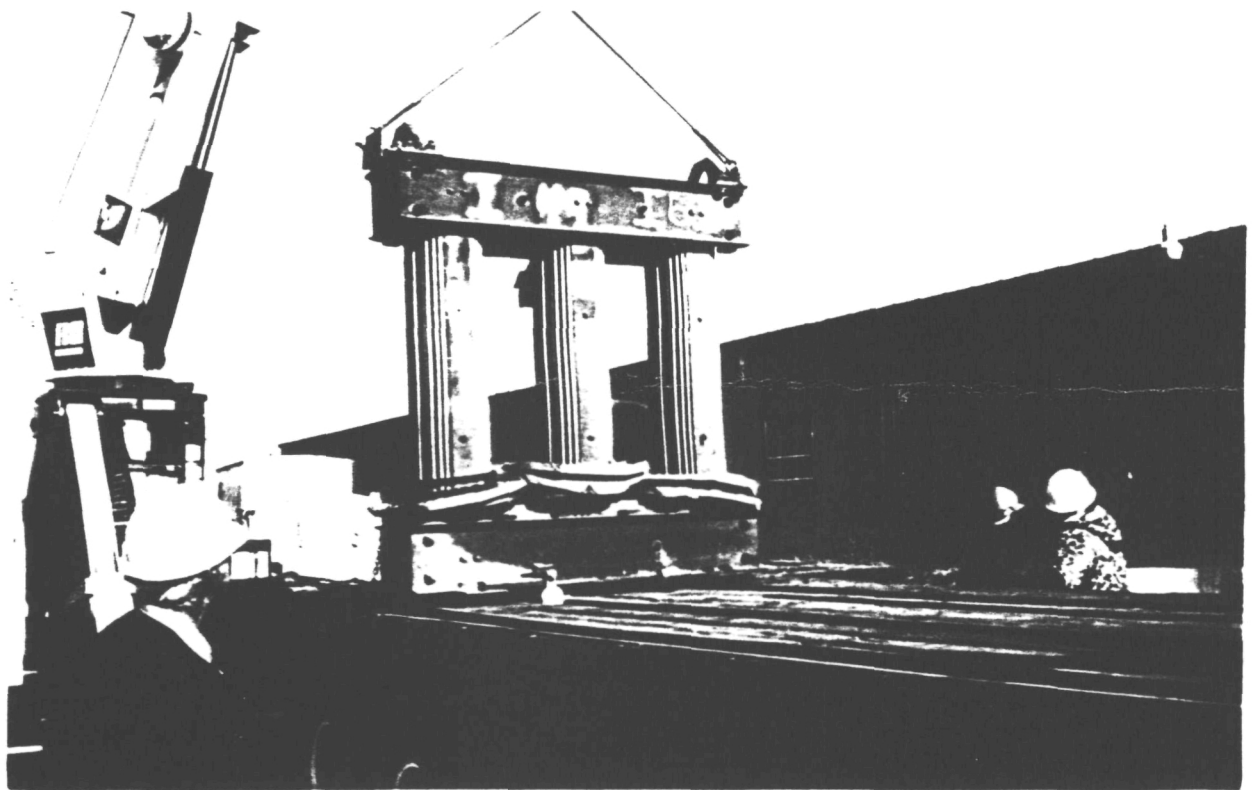
REMOVING PART OF OFFICE



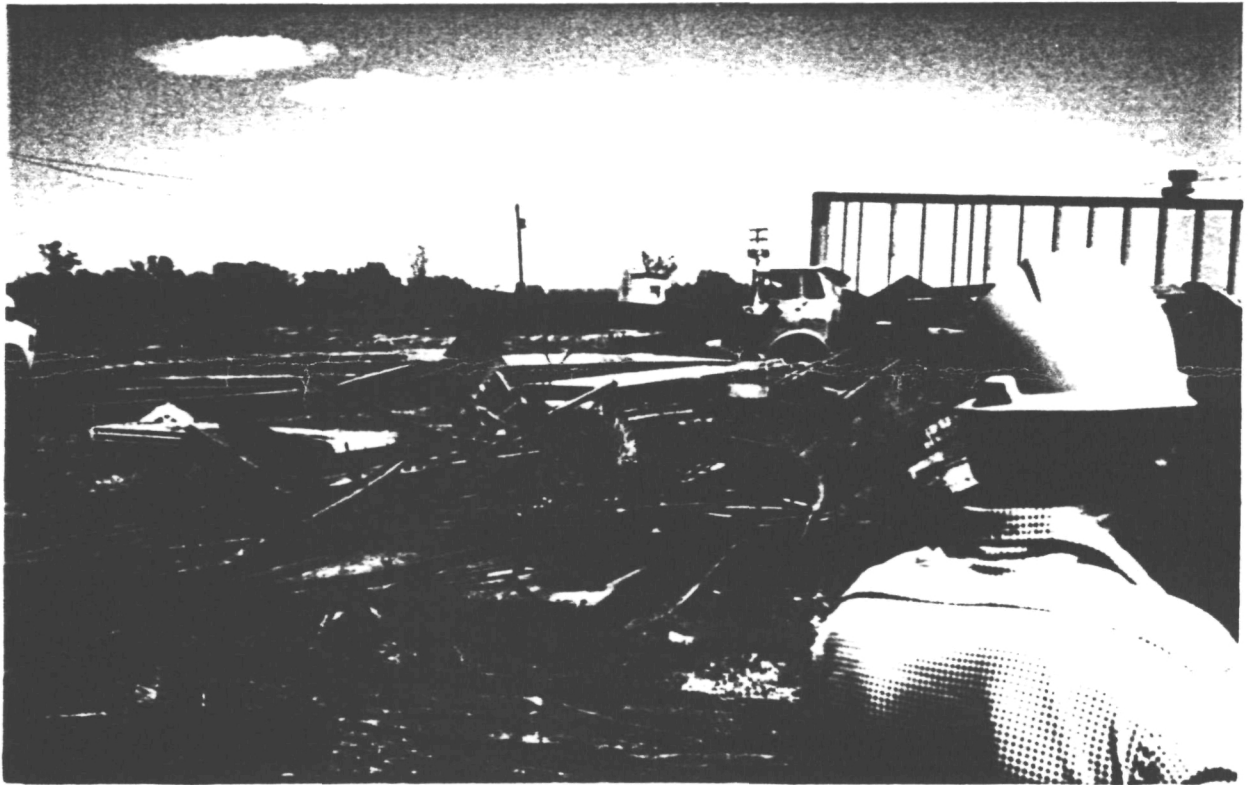
SOUTH WAREHOUSE IS ALMOST EMPTY

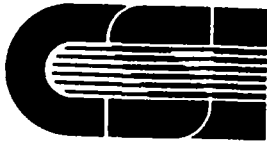


LOADING TRANSFORMER PARTS



OUTSIDE SCRAP BEING REMOVED





CLEAN SITES INC.

PO BOX 216 / HOLDEN MISSOURI 64040 / 816-732-5529 / 816-732-6357

June 3, 1988

Mr. Steven E. Kinser
Regional Project Manager
U.S.E.P.A.
Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101

SUBJECT: EPA SITE STATUS REPORT NO. 7
(AOC 87-F-0007)
ROSE CHEMICALS SITE

Deer Steve:

The EPA Site Status Report for the Rose Chemicals Site at Holden, Missouri, is attached. This report covers progress during May, 1988.

Very truly yours,

Robin J. Robinson
CSI Project Manager

RJR/clc

Enclosures

cc: Mr. George Hess
U.S.E.P.A.
Region VII
25 Funston Road
Kansas City, KS 66115

PROJECT PROGRESS REPORT NO. 7
(AOC 87-F-0007)

ROSE CHEMICALS SITE - HOLDEN, MO.

STATUS FOR MAY, 1988

I. SITE ACTIVITIES

A. REMOVAL

1. MATERIAL MOVEMENT

The removal work continued to go smoothly during May. However, the removal rate slowed down appreciably. During May 1.1 Mlbs. was removed compared to 2.7 Mlbs. during April. Cumulatively 8.1 Mlbs. of material has left the site.

Rollins began emptying drums on May 10. During the month 1,994 drums were emptied and 9 tanker loads of liquid were removed. The operation is proceeding without incident. If tankers are available, the liquid is pumped directly from the drums into the tankers. If, however, no tanker is available, liquids are pumped from the drums into a holding tank and subsequently from the holding tank into a tanker. The activity is being conducted on the back dock which leaves space around the scale for forklift movement. In the event of rain we will move the operation into the warehouse and continue the work. As drums of liquid are emptied, the drums are crushed and loaded into trucks for landfilling. The drum crusher was moved into the main warehouse to improve efficiency of this operation.

Rollins began flushing transformers on May 25. Initially the transformers were staged in the west end of the warehouse near the scale. Later we decided to put the flush fluid into the transformers where they stand to avoid the possibility of causing a leak by the extra handling. Oil dry is placed on the floor around the transformers so that if a leak or spill does occur, the oil will be adsorbed immediately. There have been a number of pinhole leaks in the hoses. Very small quantities of oil, mostly clean flush fluid, have been spilled.

Rollins continued to ship soil and debris to the Chemical Waste Management landfill in Emelle, Alabama. As discussed last month we have now switched to using flatbeds rather than enclosed vans for transporting metal debris. We also obtained EPA approval to ship transformers on flatbeds. The problem with shipping transformers in the enclosed vans was similar to the problem associated with debris: shifting loads during transit. It is much easier to tie down the transformers on a flatbed. The load is vacuumed, wrapped in Visqueen, and covered with a secure tarp to ensure that dust does not escape from the load.

2. DATA RECORDING

Rollins computer system has been completed and documented. We now have the ability to convert the Rollins data base into ASCII format on floppy disks for loading on the CSI computer.

3. CERTIFICATES OF DESTRUCTION

- a. Rollins has been very close to the sixty day limit for delivering CDs to CSI on a number of occasions. This problem is left over from last month when the shutdown of the incinerator created a backlog of Rose material at Deer Park. It now appears, however, that Rollins will be able to work their way through the backlog by early June. Once that is behind them, there should be no further problem of staying within the required 60-day window. Certificates of Disposal from the landfill have been coming in within 15-20 days.

4. REMOVAL LOG

The total weight of materials shipped during May was 1.1 Mlbs. As of May 31, 8.1 Mlbs. of material has been removed from the Rose site. The total is broken down into 4.4 Mlbs. of capacitors, 1.5 Mlbs. of liquids, and 2.2 Mlbs. of soil, debris, and transformers. Quantities removed continue to track the inventory closely. Liquids are now forecast to be 300 Klbs. or 6% more than the inventory. The increase is attributed largely to the fact that the weight of a drum is nearer 40 lbs. than the 55 lbs. assumed by CWM. The increased liquid weight will be offset by the decreased drum weight.

The removal quantities are presented graphically in Figure 1. Our forecast for completion remains mid-August, 8 weeks earlier than shown in the Work Plan. Paper work and reporting will extend 2 to 3 months beyond the mid-August date.

B. FBI DOCUMENTATION

The FBI visited the site twice during May to continue photographing items on their list. As of June 1, 159 items remained to be photographed.

Our program for setting aside articles to be photographed developed a snag during the month. The procedure has been for Rollins to set aside the articles in a special area of the warehouse and for Special Agent Jane Mason to take the photos periodically. During May, Jane fell behind and the

number of items waiting to be shot grew, creating some congestion. Therefore, she gave us oral authorization to ship the backlog without photos. About 65 items were shipped under that authorization in the first 10 days of the month. However, since that time another 21 items have slipped through both the manual and computerized checks which had been designed to prevent that from happening. Rollins has been requested to explain how this happened. Jane Mason has agreed to remove all 86 items from her list, thereby clearing our record.

C. BANKRUPTCY TRUSTEE

On May 31 we received a letter stating that Arthar B. Federman has been designated as the new trustee in bankruptcy for Rose Chemicals, Inc. In that letter we were informed that Mr. Federman did not authorize the use of his name as the generator of waste on our manifests. Since a generator's name is required on all manifests, that would have stopped the removal. After a series of phone calls involving Federman, the EPA, CSI, Steering Committee members, and outside council, it was agreed that the manifests should be modified. The new generator on the manifest is Martha C. Rose Chemicals, Inc. The manifest will be signed by a member of the CSI staff at the site on behalf of the generator pursuant to AOC 87-F-0007. This modification effectively eliminates Federman's concern regarding his personal liability.

The trustee has still not reached a decision regarding the 17 tagged items referred to in last month's report. (These items could have some resale value if decontaminated.) We have been informed that the auctioneer's evaluation report will be delivered to Federman by mid-June. There is some suggestion that the trustee will not attempt to retain all 17 items on the list.

D. SOIL REMOVAL PLAN

The soil removal plan was discussed in the Technical Subcommittee meeting on May 13. It is currently being revised based on the comments received in that meeting.

E. WATER DISPOSAL

The water disposal plan, described in last month's report, will be implemented beginning June 7. The equipment arrived on site on June 2. It has been set up and tested. On site water discharge will begin after sample analysis results have been returned from Trinity Laboratory. A letter has been written to J. McConnathy, Missouri Department of Natural Resources, confirming his authorization to pursue the water dispersal plan.

In order to make sure no liquid leaves the site and to minimize the amount of water entering the site we conducted a minor earth moving operation. We built a dike to the north of the existing storm water runoff pond which will keep water from the north and northwest from entering the site and which will trap rain water that falls on the western part of the site. It will also contain any of the purified water that fails to evaporate.

F. RI/FS WORK PLAN

The response to the EPA's comments on the RI/FS Work Plan was not completed during May. Technical and legal reviews are still going forward. The response should be completed in the first half of June and a tentative meeting date with Mr. Kinser has been set for the week of June 20.

G. HEALTH AND SAFETY

Two lost time accidents occurred during May and two more in early June. There were 2 sprained ankles, one bruised abdomen, and one case of heat exhaustion. All four have been reported to OSHA by Rollins.

The OSHA inspectors have not yet given us a final report from their inspection during April. In a return visit in May their comments focused on the failure to put a "Flammable" label on a diesel fuel tank and on the lack of three-pronged electrical plugs at various locations in the building.

Air monitoring continues.

II. FORECAST OF SITE ACTIVITIES FOR JUNE

Rollins will continue to remove debris from the site and should begin washing and cutting the empty bulk tanks. All soil, debris, scrap, etc., will be shipped to the CWM landfill.

Emptying of liquids drums will continue. At the current rate of 300 drums/day, this activity should be completed by mid-June. The rest of the month will be required to ship the liquids accumulated in the holding tanks to Deer Park. The empty drums will be crushed for landfiling.

Transformer draining and flushing will continue through June.

We estimate approximately 2.5 Mlbs. will leave the site during June, see Figure 1.

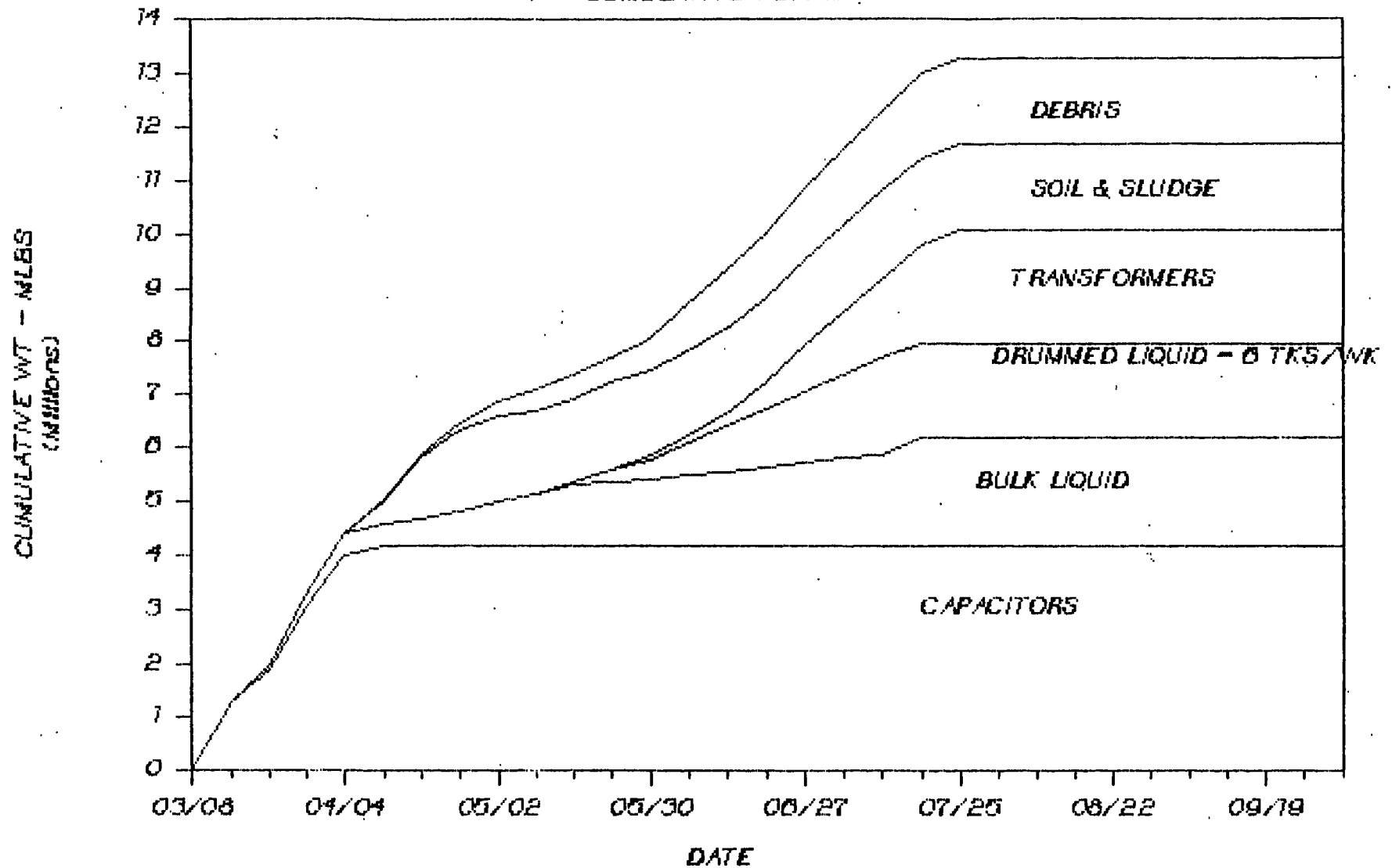
We expect the bankruptcy trustee to reach a decision regarding the items on the site which he wishes to withdraw from the removal operation.

We expect the FBI to complete their photographic documentation during the month.

The final RI/FS Work Plan will be discussed with the EPA.

REMOVAL FORECAST

CUMULATIVE TOTALS



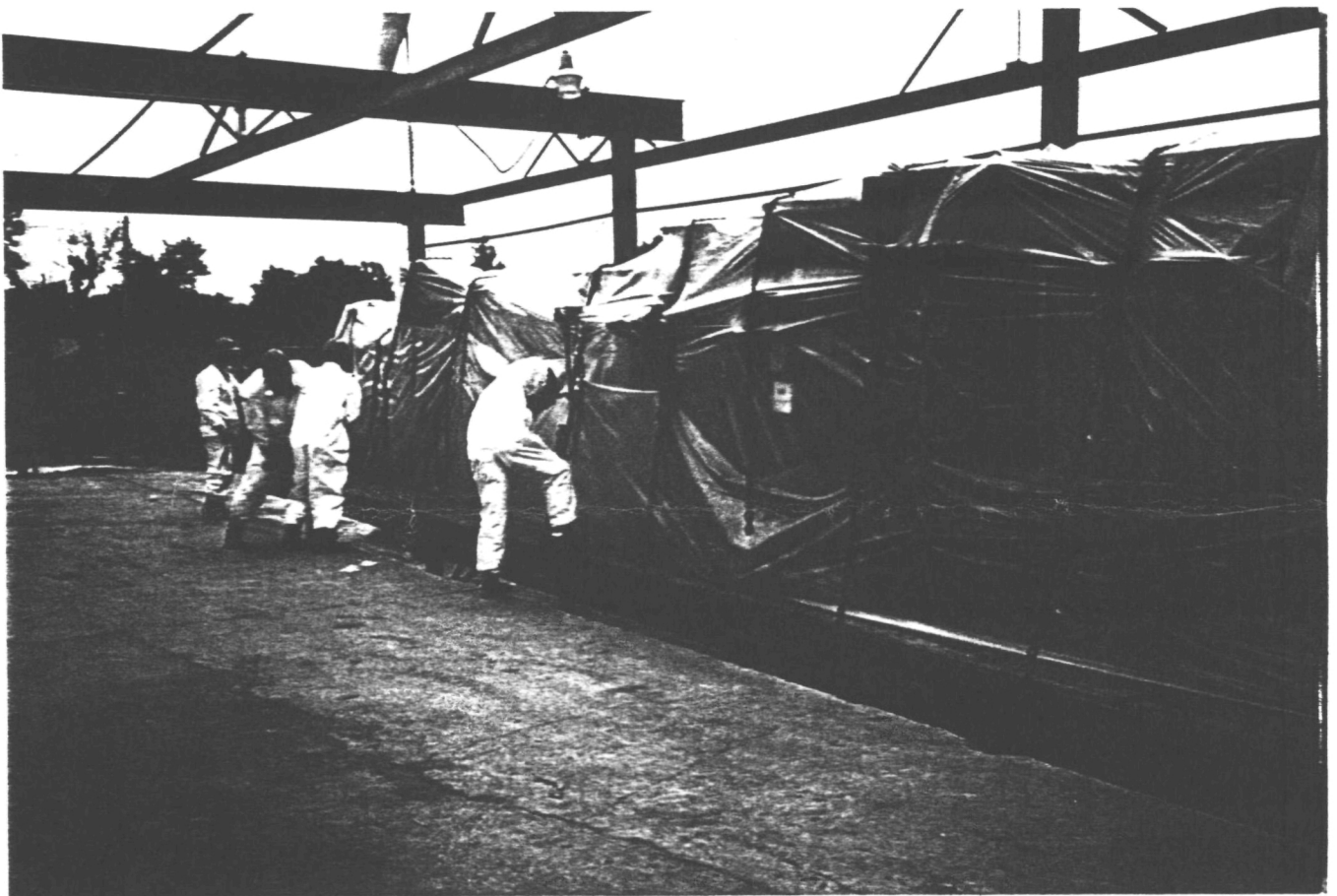
LOADING FAIRBANKS-MORSE ENGINE



FLUSHING TRANSFORMERS

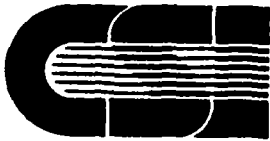


LOADING OF TRANSFORMERS



DRAINING DRUMS OF LIQUID





CLEAN SITES INC

PO BOX 216 / HOLDEN MISSOURI 64040 / 816-732-5529 / 816-732-6357

July 18, 1988

Mr. Steven E. Kinser
Regional Project Manager
U.S.E.P.A.
Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101

SUBJECT: EPA SITE STATUS REPORT NO. 8
(AOC 87-F-0007)
ROSE CHEMICALS SITE

Dear Steve:

The EPA Site Status Report for the Rose Chemicals Site at Holden, Missouri, is attached. This report covers progress during June, 1988.

Very truly yours,

Robin J. Robinson
CSI Project Manager

RJR/clc

Enclosures

cc: Mr. George Hess
U.S.E.P.A.
Region VII
25 Funston Road
Kansas City, KS 66115

Mr. Jim Kohanek, Clean Sites, Inc.

PROJECT PROGRESS REPORT NO. 8
(AOC 87-F-0007)

ROSE CHEMICALS SITE - HOLDEN, MO.

STATUS FOR JUNE, 1988

I. SITE ACTIVITIES

A. REMOVAL

1. MATERIAL MOVEMENT

The removal work continued to go smoothly during June. The removal rate, while slightly faster than in May, was still slower than our forecast of 2.5 Mlbs. During June approximately 1.6 Mlbs. was removed compared to 1.1 Mlbs. during May. Cumulatively 9.7 Mlbs. of material has left the site.

Removal of liquid remains the critical path activity for the project. Rollins completed emptying the drums in the warehouse on June 15. However, because of problems with the incinerator at Deer Park, Texas, Rollins was only able to ship 675 Klbs. (16 loads) of liquid during the month. Consequently, the liquid from the drum emptying operation was pumped into the outside bulk storage tanks on site. This positions us for rapid removal once incineration capacity becomes available, but it still is a bottleneck to the rapid completion of the project.

Drum crushing is essentially complete. The crushed drums were shipped to the Chemical Waste Management landfill in Emelle, Alabama. 14 loads of debris were also shipped to the landfill during June.

Transformer flushing continued during the month. 420 transformers have been drained, flushed, and shipped off site to the landfill. Another 111 transformers have been flushed, but are still on site awaiting transportation. This leaves approximately 185 of the larger transformers still to be flushed. Rollins is finding less oil in the transformers than was predicted in our inventory. We assumed the transformers would be half full. This corresponds to 35 Kgal. So far Rollins has only emptied 22 Kgal. from the transformers. They are also forecasting that we will required less flush fluid than predicted. The current estimate is 35 Kgal. compared to 88 Kgal. in the inventory.

Transformer handling has been made easier by the use of the overhead crane in the American Steel portion of the warehouse. Use of that crane will increase as we begin handling the larger transformers.

One more load of capacitors was shipped to the Deer Park incinerator during June.

E. AUDIT OF CHEMICAL WASTE MANAGEMENT LANDFILL

The landfill was audited by Fred Manhart, Gene Senat, and Robin Robinson on June 17. A report of that trip has been given to the Technical Subcommittee members. Some problems in the paperwork were detected and corrected. The operation appears to be satisfactory.

F. FBI DOCUMENTATION

Rollins has responded to CSI's request for an explanation of how 86 on the FBI list items were shipped prior to being photographed. The explanation appears to be that there was a failure of communication among the parties involved. Since the FBI does not seem to be greatly concerned, we are inclined to let the matter drop. Jane Mason has not yet provided a letter removing those items from her list, but she has repeated that she intends to do so. There are 83 items remaining to be photographed.

G. BOMB THREAT

A phone call was received by the guard at the facility slightly after 9:00 pm on June 15. The caller stated his intention to "blow the place". The guard took the proper emergency action notifying Local Dispatch and Jerry Hollingsworth who in turn notified the Project Manager and George Duncan. We also notified the FBI, George Murray, and Gene Senat. The local police responded promptly, and we brought in additional guards from Danguard. No physical evidence of an attempt to enter the site was found. We authorized the FBI to tap the telephones in the event that a repeat call was made. Nothing unusual has occurred since that time.

H. BANKRUPTCY TRUSTEE MATERIAL

The bankruptcy trustee has informed us that he intends to release all material on the site to CSI for removal. Thus the 17 tagged items, including the boat and the Bentley, will be available for removal once a 30-day waiting period has passed. This waiting period is required to give the creditors time to object if they feel the material has some value. If no objection is received the trustee will release the material. If an objection is filed, then the trustee will seek a judgement supporting his decision.

I. SOIL REMOVAL

A bid has been received from Rollins for the removal of approximately 1 Mlbs. of soil from the site. This bid is currently being reviewed by the Technical Subcommittee. It is a sole source bid and an option would be to seek competitive bids. It is currently CSI's recommendation the Rollins bid be accepted. After Technical Subcommittee review, Steering Committee approval will be required.

J. WATER DISPOSAL

As of July 1 the liquid level in the pit was down to 13 inches. As of July 11 only 5 inches of water remained in the pit. Approximately 60,000 gallons have been pumped through the Charcoal Adsorption System. The effluent from the system still shows the PCB concentration to be below detection limit. The water is being sprayed on the northwest corner of the site where the sunflowers are doing nicely.

K. RI/FS WORK PLAN

The Work Plan was approved by Steve Kinser on June 20. The document incorporating the EPA's comments and the Technical Subcommittee's response was put together expeditiously by ERT. This Work Plan provides the Scope of Work for the bidding which is now in progress.

The Request for Proposal for conducting the RI/FS was sent to five firms on July 8. Bids are due back to CSI on August 2. We are targeting to review the bids and have award recommendations for the Technical Subcommittee and Steering Committee meetings in Denver during the week of August 15. The target date for contract award is September 1.

L. HEALTH AND SAFETY

One minor lost time accident occurred during the month of June. Due to the extremely hot weather, Rollins is taking great care to protect workers against dehydration and heat stress.

Rollins met with OSHA inspectors early in July regarding a citation resulting from their inspection in April. Rollins reported that OSHA reduced the citation from "serious" to "non-serious". This citation involved a worker wearing a torn tyvek suit with some PCB-contaminated oil inside. We have still not received the final OSHA report.

A health and safety audit was made by Paul Thomas, Rollins's chief Health and Safety officer on July 7 and 8. He reported no significant problems at the site and commended the group on the improved housekeeping. He also recommended removing the south warehouse from the restriction zone since it is now empty. We have done this as it makes it easier for us to show that part of the site to visitors.

Air monitoring continues.

M. SITE VISITS

The site was visited by several PRPs during June. Other visits during July are anticipated.

N. STAFF CARE AND FEEDING

A serious blow was received during June when Wilma and Ernie Arnold closed Holden Sundries after a run of more than 30 years. This removed the main source of nourishment for the CSI Project Management staff. We are currently scouting out substitute facilities, but frankly there's no substitute for Wilma. All care packages will be gratefully accepted.

II. FORECAST FOR JULY

Rollins will finish the transformer flushing operation and will continue to remove transformers and debris from the site.

Shipment of liquid will continue at a rate of approximately 5 tankers per week. At this rate liquid removal would continue well into September. Rollins will continue to seek alternate incinerators.

We estimate approximately 2.5 Mlbs. will leave the site during June. See Figure 2.

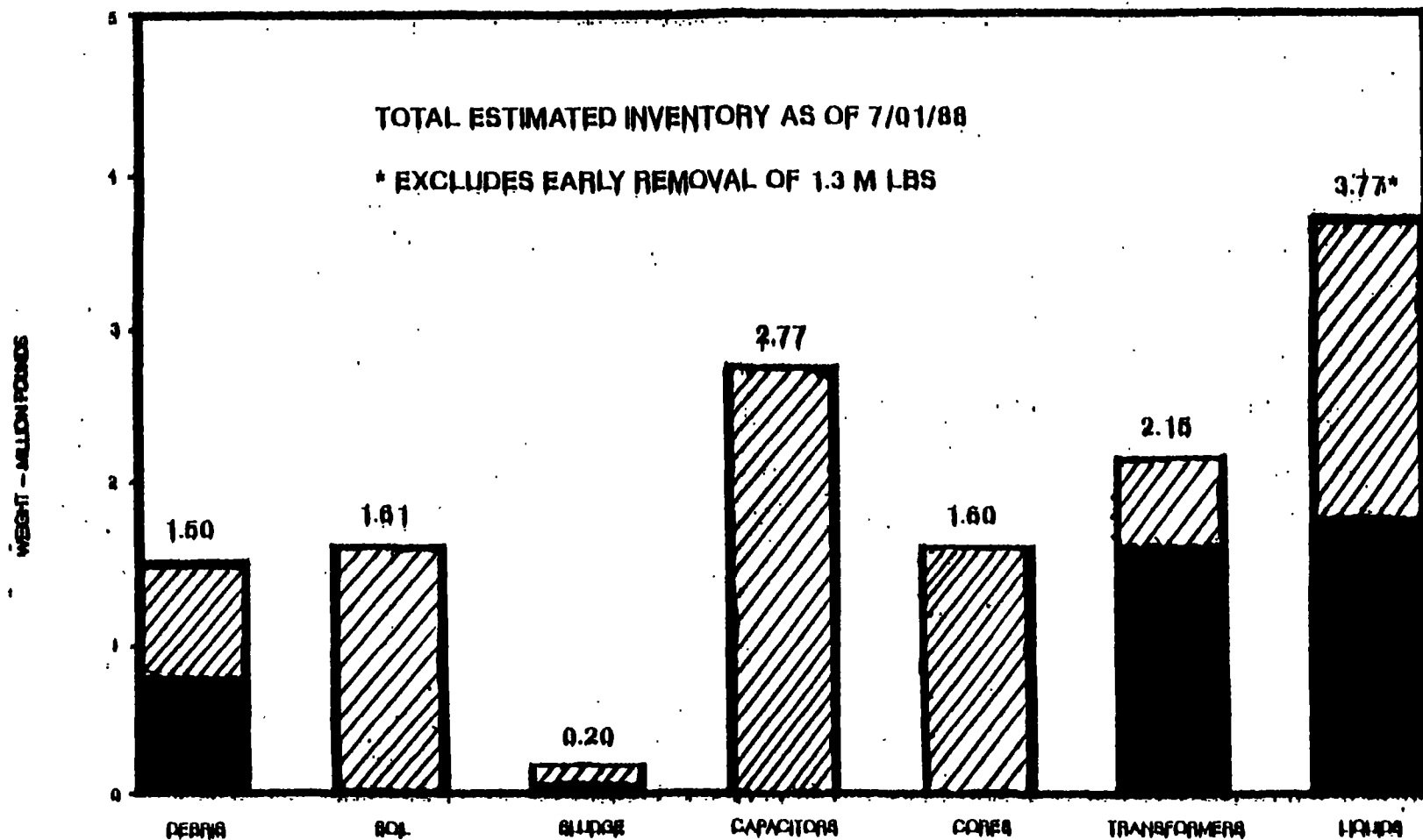
The FBI should complete their photographic documentation during the month, although there may be a few items that drag over into August.

Site visits by PRPs and the RI/FS bidders will take place.

FIGURE 1

SITE WASTE DISTRIBUTED BY MATERIAL TYPE

CURRENT ESTIMATED TOTAL INVENTORY 13.59 MILLION POUNDS

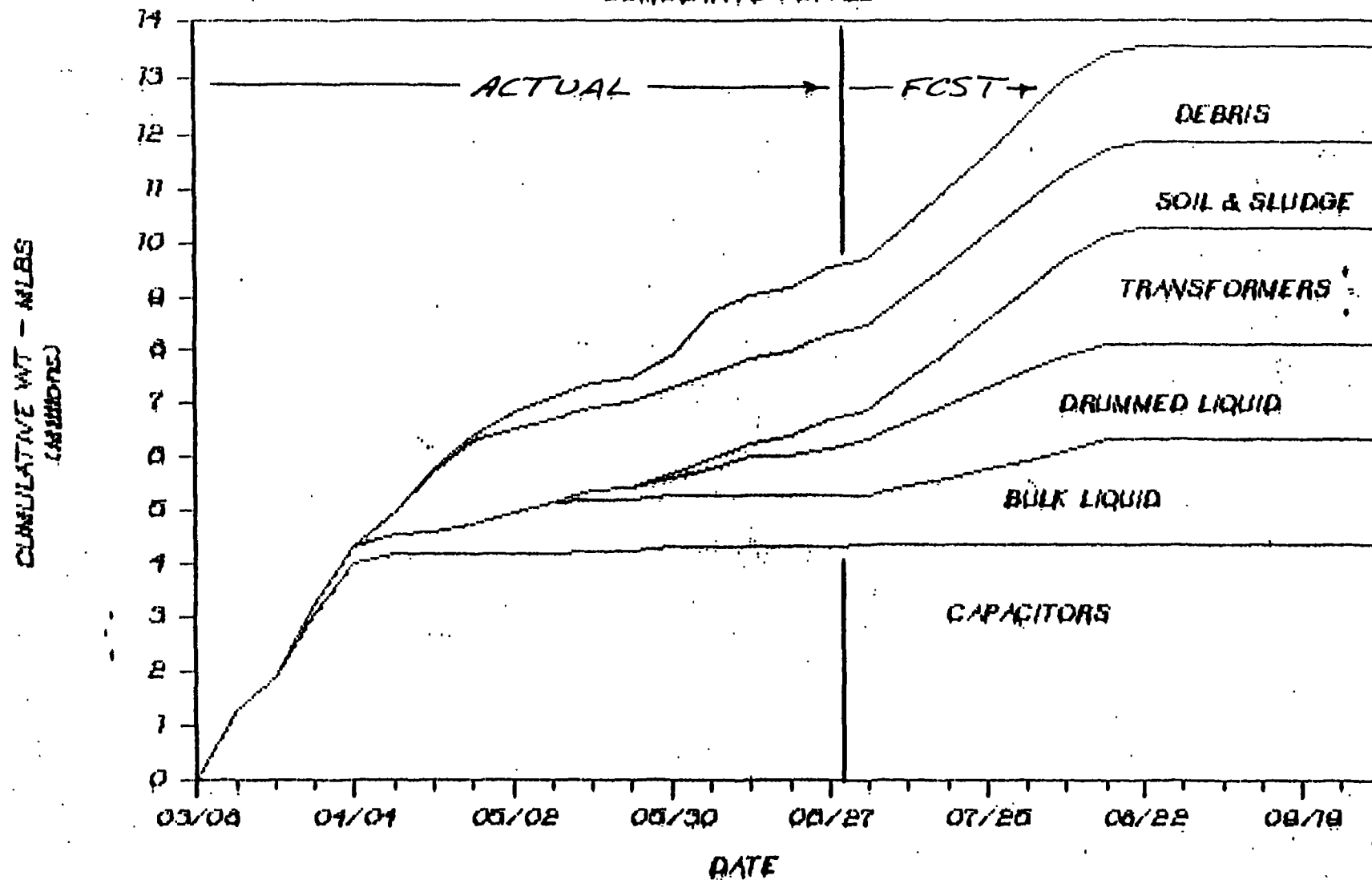


7/01/88

MARTHA C. ROSE CHEMICAL CO. SITE

REMOVAL FORECAST

CUMULATIVE TOTALS



7/1/88



CLEAN SITES INC

1199 NORTH FAIRFAX STREET / ALEXANDRIA VIRGINIA 22314 / 703-683-8522
TELECOPIER NO. 703-548-8773
MIDWEST REGIONAL OFFICE: 1400 E. TOUHY AVENUE / SUITE 215 / DES PLAINES, IL 60018 / 312-635-7580

August 15, 1988

Mr. Steven E. Kinser
Regional Project Manager
U.S.E.P.A.
Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101

SUBJECT: EPA SITE STATUS REPORT NO. 9
(AOC 87-F-0007)
ROSE CHEMICALS SITE

Dear Steve:

The EPA Site Status Report for the Rose Chemicals Site at Holden, Missouri, is attached. This report covers progress during July, 1988.

Very truly yours,

Robin J. Robinson
CSI Project Manager

RJR/sjr

Enclosures:

cc: ✓ Mr. George Hess
U.S.E.P.A.
Region VII
25 Funston Road
Kansas City, KS 66115

Mr. Jim Kohanek, Clean Sites, Inc.

CHAIRMAN OF THE BOARD/Russell E. Train PRESIDENT/Thomas P. Grumbly BOARD OF DIRECTORS/Peter A.A. Berle,
Douglas M. Costle, Archibald Cox, Louis Fernandez, Sandra S. Gardebring, Edwin A. Gee, Jay D. Hair, Donald Kennedy,
H. Eugene McBrayer, Gilbert S. Omenn, Charles W. Powers, William K. Reilly, Henry B. Schacht, Roger Strelow, Hans A. Wolf

**PROJECT PROGRESS REPORT NO9
(AOC 87-F-0007)**

ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR PERIOD JULY 1ST THROUGH JULY 31ST 1988

HIGHLIGHTS

- o The removal work continues with no major problems in July.
- o Cumulatively, 11.6 million pounds of material have been removed from the site. During July, 1.9 million pounds were shipped off site.
- o All transformers have been flushed and removed.
- o Only 15 loads of liquid remain on site.
- o The pit in the process area is essentially empty.
- o Certificates of Destruction are being returned well within the 60 day limit.
- o The latest schedule for all removals from site is September 15, 1988, six weeks ahead of schedule.
- o Four bids were received for the RI/FS work activity and the evaluation is underway.

PROGRESS REPORT NO.9
(AOC 87-F-007)

ROSE CHEMICALS SITE - HOLDEN, MISSOURI

STATUS FOR JULY, 1988

I. SITE ACTIVITIES

A. REMOVAL

1. Material Movement

The removal work continued without major problems during July. The removal rate was 1.9 million pounds for the month, lower than our forecast of 2.5 million pounds but slightly higher than the June rate of 1.6 million pounds. Cumulatively, 11.6 million pounds of material have left the site. There were two primary reasons for the removal rate being lower than our forecast. First, only 21 loads of liquid were shipped during the month instead of the 24 loads planned. Second, we are now picking up debris and shipping it off site. The debris is much harder to handle than crated material; furthermore, it is light, so we are unable to ship a full 40,000 lbs. in a truck. The average weight of debris per truck is around 30,000 lbs.

Liquid removal continues to be the project bottleneck. As stated above only 21 loads (880 thousand pounds) of liquid were shipped in July. The Deer Park incinerator was shut down from July 26 through August 2. In an attempt to accelerate the removal, Rollins arranged with APTUS (formerly Pyrochem) to incinerate some of our material. This helped, but APTUS would only take three loads per week, and as of the first week in August, Rollins terminated the arrangement over an apparent cost dispute.

Transformer flushing and removal has been completed. We identified 30 "problem" transformers which either had so many holes in them that they would not hold liquid, or were filled with various forms of debris. After presenting a detailed analysis of the problem

to Steve Kinser, we obtained his authorization to ship the debris filled transformers to the landfill without the 18-hour flush. Several of the transformers contained capacitor parts. These were removed, containerized, and shipped to the Deer Park incinerator. Those transformers were then flushed in the normal fashion. While we do not have a firm tabulation of the amount of transformer oil and flush used in the drain-and-flush operation, it appears that only 186 thousand pounds of transformer oil was removed compared to 388 thousand pounds in our inventory estimate. Total flush used is roughly 280 thousand pounds compared to 700 thousand pounds in the inventory estimate.

Debris removal continued during the month with all the material being shipped to the Chemical Waste Management landfill in Alabama. We are using a front end loader inside the building to improve the efficiency of debris removal. The offices in the Main Warehouse have now been knocked down and cleaned out. We have also removed several large air conditioning units from the outside of the building. This activity created several holes in the building walls. The condition of the building appears to worsen the more we see of it.

B. DATA RECORDING

In carrying out quality control checks of the data being recorded by Rollins we discovered that the inventory weights shown in Rollins's data base are incorrect in a number of cases. Although this will have no impact on the recording of actual weights, we have asked Rollins to investigate how the incorrect information got into their system. The controlling data base for the inventory weights is on CSI's computer in Alexandria. That data was copied onto floppy disks and transferred to Rollins's headquarters. It was then transferred to Rollins's consultant who finally brought it to the site. Somewhere in the chain of transfers the correct data apparently was erased or replaced with the wrong numbers. Since the data leaving the site will not include the inventory values, the erroneous numbers are of no practical importance. Nevertheless, we want to know how they were introduced.

C. CERTIFICATES OF DESTRUCTION

As reported last month Rollins should have no further problem in incinerating our material within the 60-day limit. The current status of CDs is as follows:

<u>Shipment of</u>	<u>Outstanding CDs</u> <u>(No)</u>	<u>Oldest CD</u> <u>(Days)</u>
Scrap and Debris	44	46
Liquid	9	13
Capacitors	3	33
Sludge	2	50

D. REMOVAL LOG

The total weight of materials shipped during July was 1.9 million pounds. As of July 31, 11.6 million pounds of material had been removed from the Rose Site. The site total is broken down into 4.4 million pounds of capacitors, 3.0 million pounds of liquid and sludge, 0.5 million pounds of transformers, and 3.7 million pounds of soil and debris.

Quantities removed continued to track the inventory closely. Weight of transformers and parts is now 1.85 million pounds, 10% over the inventory as compared to 15% above the inventory in last month's report. The change is as we predicted: the larger transformers weighed significantly less than shown on the inventory because the inventory used name plate weights which assume the transformers to be full of oil. Actually, most of the large transformers did not contain any oil and therefore weighed significantly less than shown on the inventory.

The total liquid forecast to be removed from the site by Rollins is now estimated to be 3.54 million pounds. The site total, including the earlier Pyrochem removal, is 4.8 million pounds. This is about 800 thousand pounds, or 14%, lower than the inventory estimate. At the end of July 700 thousand pounds of liquid (approximately 15 tanker loads) remained on site.

This pleasant change from last month's forecast is due to the lower-than-expected quantities of flush, transformer oil, and drummed liquid.

Weight of capacitors removed is approximately 20% greater than the inventory quantity. This is due to the fact that the crates containing the capacitors were incinerated, along with the capacitors themselves. In the inventory, it was assumed that the crates would be landfilled. Deducting the crate weight from the total reduces the excess to 13% over inventory.

Overall we expect the total weight of materials on the site to be within 5% of the inventory total.

The removal status is shown graphically in Figure 1. It gives the cumulative removal to date and shows the forecast for the remainder of the job. The forecast schedule still depends heavily upon the rate at which the liquid can be removed and incinerated. Our current forecast for completion of the job is September 15, slipping another two weeks from the September 1 forecast last month. This is still 6 weeks ahead of the schedule in the work plan.

E. FBI DOCUMENTATION

The FBI visited the site once during July. All but 68 items on their list have now been photographed. Apparently some additional drums were crushed before being photographed. This has been reported to the FBI Special Agent.

A Special Deputy Marshall for the EPA office of Criminal Investigation came to the site to remove 3 containers of transformer name plates. These were requested by Reuben McCullers.

F. BANKRUPTCY TRUSTEE MATERIAL

The bankruptcy trustee's hearing on August 1 was delayed until August 8. We have authorized Rollins to begin dismantling the large presses and other equipment but have not released these items for shipment to the landfill.

G. SOIL REMOVAL

On August 1, the Steering Committee approved the removal of soil contaminated to greater than 10 ppm from the Rose Site. The major areas of contamination to be treated are single-hatched in the sketch in Figure 2. These blocks are those which showed PCB concentrations greater than 25 ppm in the earlier sampling and analysis program. The blocks with concentrations between 10 and 25 ppm are shown crosshatched. Approximately 8 inches of soil will be removed in all those areas. Rollins plans to begin this work in early August in order to keep their crews busy in between liquid removal and tank cleaning activities. A Work Plan amendment covering soil removal has been submitted to the U.S.E.P.A. for review and approval.

H. WATER DISPOSAL

The pit inside the Main Warehouse is now empty except for about 2 inches of water, which the pumps cannot remove. We plan to put a shallow sump in the pit to remove the water remaining, in order to allow us to dry the pit completely.

I. RI/FS

Bids were received on August 2 from four of the five companies who were asked to bid on the RI/FS. CSI is now evaluating these bids. We expect to have an award recommendation for the RI/FS Task Force, the Technical Subcommittee and the Steering Committee in Denver during the week of August 15. The target date for contract award remains September 1.

J. HEALTH AND SAFETY

One minor loss time accident occurred during the month of July, a back injury. Air monitoring continues.

PROJECT PROGRESS REPORT NO9
(AOC 87-F-0007)

ROSE CHEMICALS SITE, HOLDEN, MO.

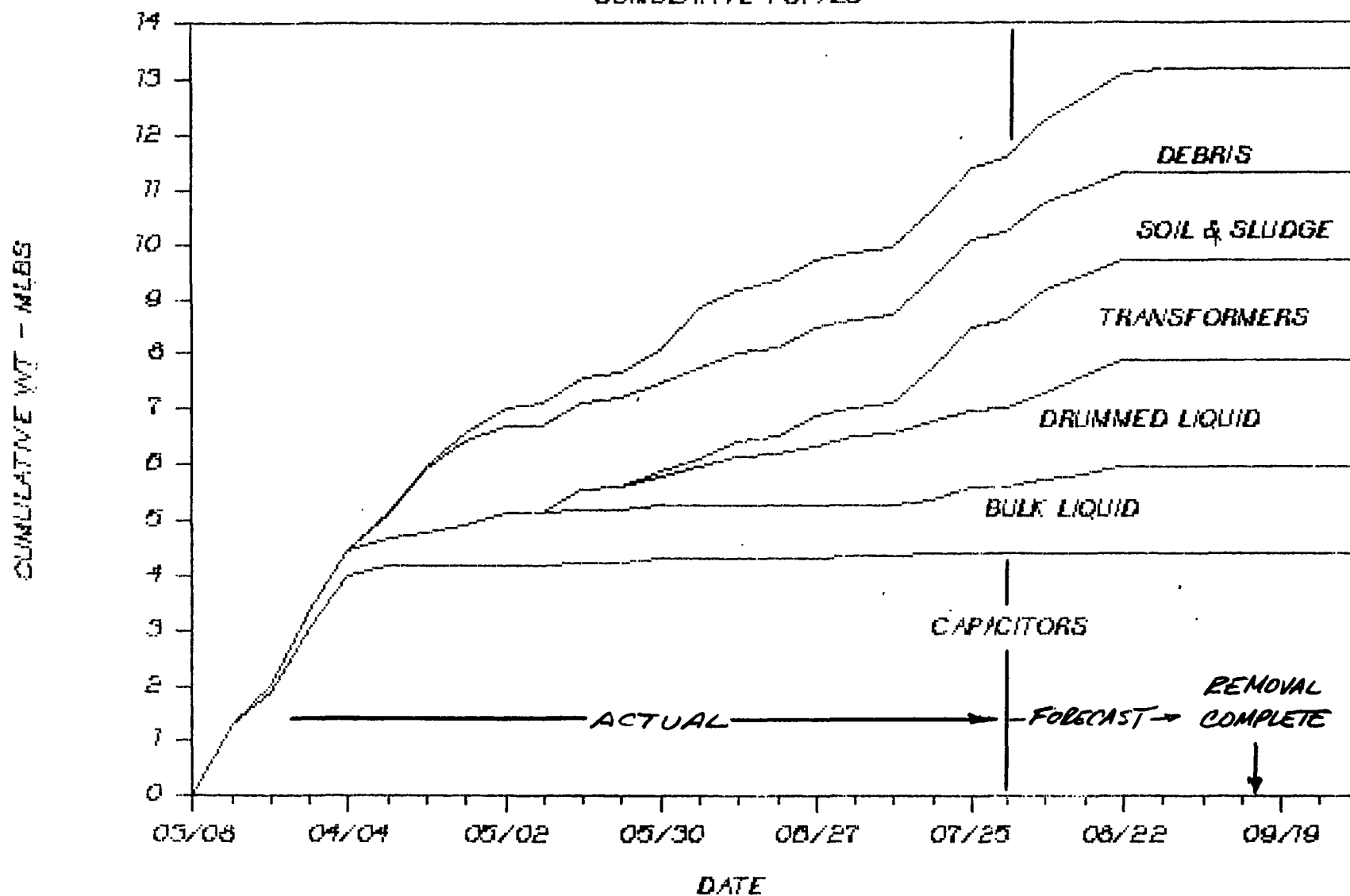
STATUS FOR PERIOD JULY 1ST THROUGH JULY 31ST 1988

HIGHLIGHTS

- o The removal work continues with no major problems in July.
- o Cumulatively, 11.6 million pounds of material have been removed from the site. During July, 1.9 million pounds were shipped off site.
- o All transformers have been flushed and removed.
- o Only 15 loads of liquid remain on site.
- o The pit in the process area is essentially empty.
- o Certificates of Destruction are being returned well within the 60 day limit.
- o The latest schedule for all removals from site is September 15, 1988, six weeks ahead of schedule.
- o Four bids were received for the RI/FS work activity and the evaluation is underway.

REMOVAL FORECAST

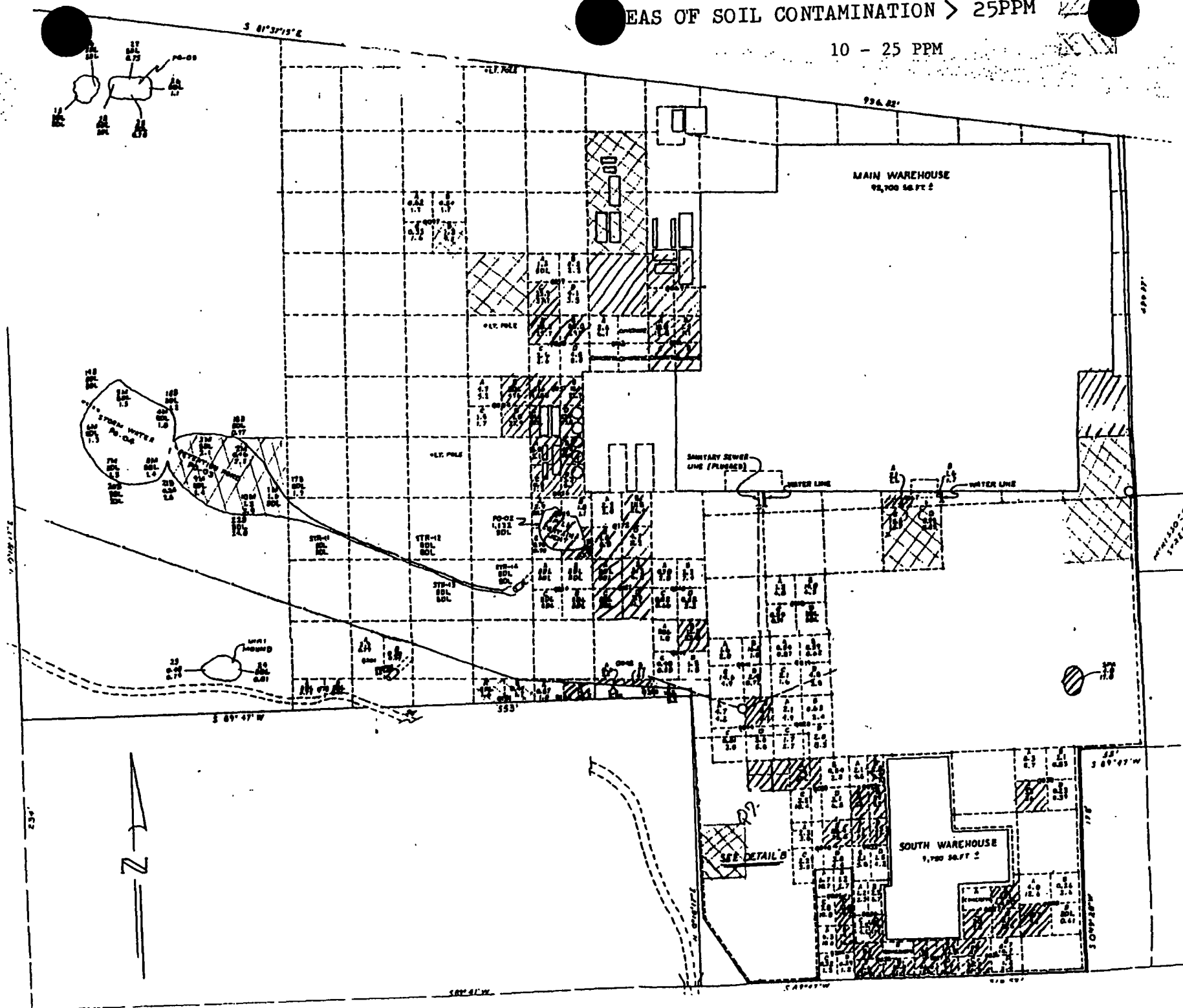
CUMULATIVE TOTALS



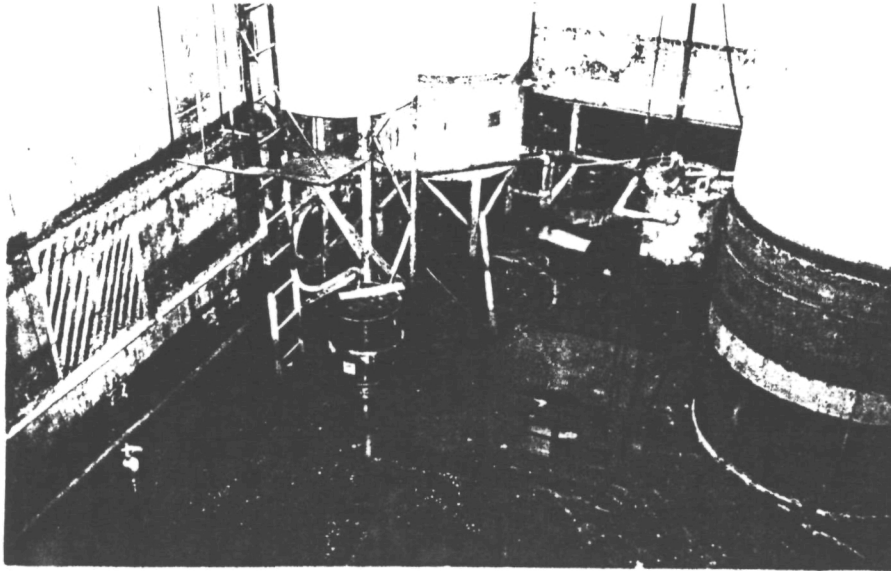
ROSE CHEMICALS SITE AREAS OF SOIL CONTAMINATION > 25PPM

FIGURE 2

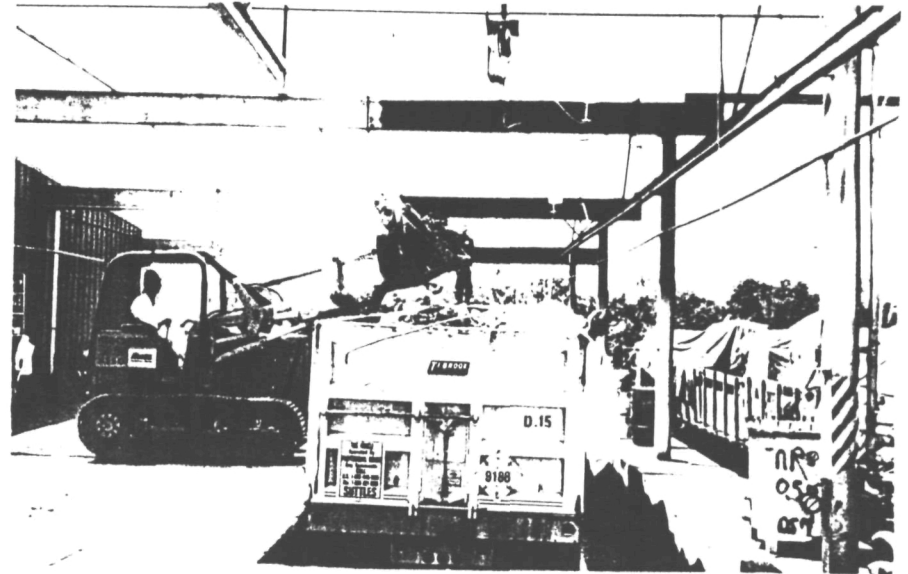
10 - 25 PPM



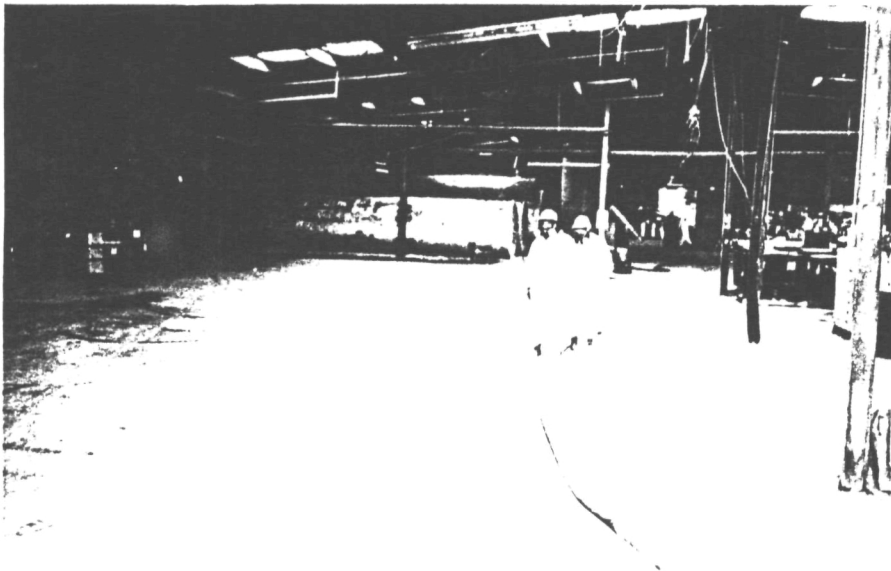
The Pit - almost empty



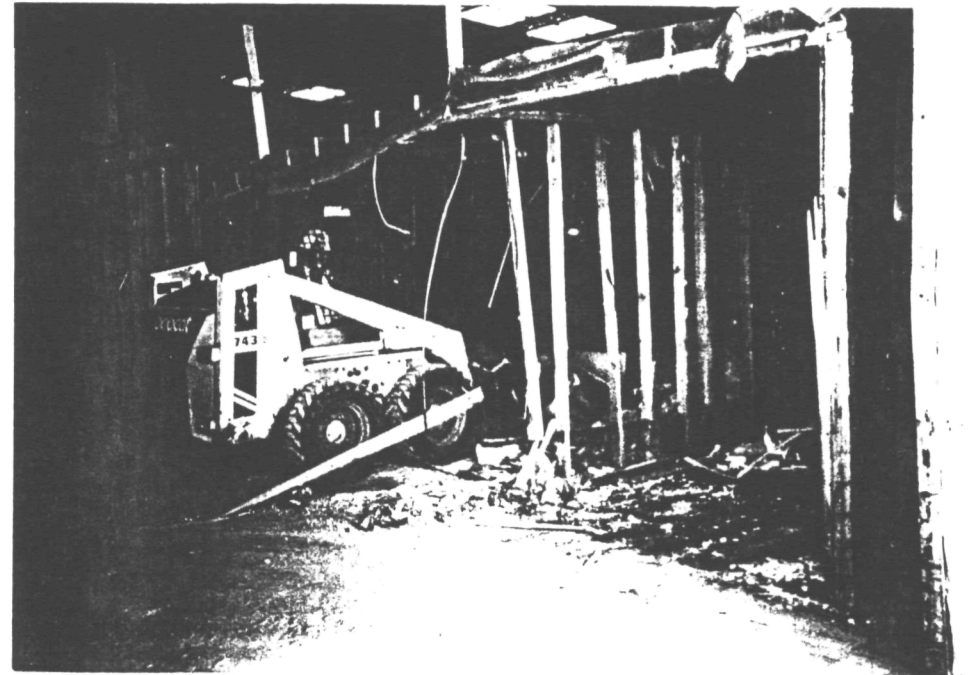
Loading debris into dump truck



Main Warehouse - empty spaces



Down go the offices





CLEAN SITES INC

PO BOX 216 / HOLDEN MISSOURI 64040 / 816-732-5529 / 816-732-6357

September 8, 1988

Mr. Steven E. Kinser
Regional Project Manager
U.S.E.P.A.
Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101

SUBJECT: EPA SITE STATUS REPORT NO. 10
(AOC 87-F-0007)
ROSE CHEMICALS SITE

Dear Steve:

The EPA Site Status Report for the Rose Chemicals Site at Holden, Missouri, is attached. This report covers progress during August, 1988.

Very truly yours,

Robin J. Robinson
CSI Project Manager
Rose Chemicals Site

RJR/clc

Enclosures

cc: Mr. George Hess
U.S.E.P.A.
Region VII
25 Funston Road
Kansas City, KS 66115

Mr. Jim Kohanek, Clean Sites, Inc.

PROJECT PROGRESS REPORT NO. 10
(AOC 87-F-0007)

ROSE CHEMICALS SITE, HOLDEN, MD.

STATUS FOR PERIOD AUGUST 1ST THROUGH AUGUST 31ST 1988

HIGHLIGHTS

- o The removal work continued with no major problems in August. Cumulatively, 13.5 Mlbs. of material have been removed, excluding the soil removal. During August 1.9 Mlbs. was removed in addition to 688 Klbs. of contaminated soil.
- o All liquid has been removed. Significantly less liquid was found at the site than anticipated, but this is partially balanced by increased quantities of sludge and debris.
- o Bulk liquid tanks are being shipped to the landfill without being cut into pieces as a cost saving measure.
- o Removal of contaminated soil began on August 29. The eastern storm water runoff pond has been drained and cleaned as has the bermed area to the west of the main warehouse.
- o Burns and McDonnell has been selected as the RI/FS contractor. Contract award will be in mid-September.

PROGRESS REPORT NO. 10
(AOC 87-F-0007)

ROSE CHEMICALS SITE - HOLDEN, MISSOURI

STATUS FOR AUGUST, 1988

I. SITE ACTIVITIES

A. REMOVAL

1. Material Movement

The removal work continued without major problems during August. The removal rate was 1.9 Mlbs. for the month, roughly the same as our forecast of 2.0 Mlbs. and equal to the July rate. Cumulatively, 13.5 Mlbs. of material have left the site.

The last liquid load was shipped on August 30. Thus, the liquid bottleneck has finally been removed. Several of the bulk liquid tanks were found to contain significant quantities of sludge. This material cannot be removed by the normal pumping equipment, therefore, Rollins has been authorized to bring in a special pump truck called a Vactor, or Super Sucker, to handle the excess sludge. Three loads of sludge were removed during August.

The removal of the bulk tanks began on August 18. Rather than wash the tanks and cut them up, we obtained EPA authorization to ship them whole to the landfill. The tanks are drained and then a hole is cut in one end. Oil dry is added to adsorb any free liquid. The tanks are then placed on a lowboy, wrapped in visqueen, and tarped for transport to the landfill. This operation has been carried out without any major difficulty.

As tanks are removed, more debris is being created. However, all the loose debris around the site has now been picked up. There are roughly 5 loads of debris left to complete the job.

B. CERTIFICATES OF DESTRUCTION

Rollins continues to return CDs within the 60-day limit. The status of CDs as of September 7 is as follows:

<u>Shipment of:</u>	<u>Outstanding CDs</u> <u>(No.)</u>	<u>Oldest CD</u> <u>(Days)</u>
Scrap and Debris	48	47
Liquid	9	26
Capacitors	3	54
Sludge	6	40
Tanks	16	20

C. REMOVAL LOG

The total weight of material shipped during August was 1.9 Mlbs. As of August 31, 13.5 Mlbs. of material had been removed from the site. Quantities removed continue to track the inventory closely. This is shown in the table below which compares the amount of material actually removed in 6 categories with the inventory quantities of that material.

REMOVAL SUMMARY AS OF 8/26/88

<u>MATERIAL TYPE</u>	<u>ACTUAL WT.</u>	<u>INVENTORY WT.</u>	<u>DELTA %</u>
DEBRIS	3,143,220	2,276,135	38
TRANSFORMERS	1,892,260	1,677,544	13
LIQUID	3,466,420	4,323,826	-20
CAPACITORS	4,445,577	3,913,127	14
SLUDGE	358,993	182,346	97
TANKS	164,770	500,000	-67
	-----	-----	
TOTAL	13,471,240	12,872,978	5

The table shows 38% more debris than was shown in the inventory. However, we removed certain items which were not included in the inventory: sand bags, office partitions, concrete in the south warehouse, and air conditioning units. The total weight for these "extra" items is 775 Klbs. Subtracting that quantity from the actual weight reduces the percentage overrun for debris to 4% so far. The large overrun in sludge is more than compensated for by the smaller amount of liquid removed. Capacitors and transformers show modest overruns which had been predicted in previous reports. The tank underrun is not real, since there are still more tanks to be removed. That fact should be borne in mind when studying this table. It does not reflect the total removal, but only the quantities removed as of August 26. By the time the removal is completed we estimate that the total weight of materials removed will be within 10% of the inventory total.

The removal status is shown graphically in Figure 1 as usual. It shows the cumulative removal to date and the forecast for the remainder of the job. The current forecast for completion is October 1, slipping two weeks from last month's forecast, but still four weeks ahead of the schedule in the work plan.

D. FBI DOCUMENTATION

The FBI has completed their photographic documentation of the items on their list. A total of 688 items were photographed. The FBI has promised to give us a letter certifying the completion of this program.

E. BANKRUPTCY TRUSTEE MATERIAL

The bankruptcy trustee released all material on site to us for removal on August 29. The material is being shipped with the bulk tanks to increase the weight of each load.

F. SOIL REMOVAL

The soil removal program got off to a good start on August 29 with the draining and scraping of the eastern storm water runoff pond. Uncontaminated water was pumped from the eastern pond into the northern one. Soil was then scraped from the bottom and mixed with several loads of flue dust to consolidate it for shipping to the landfill. The mixed material was then loaded into dump trucks and removed from the site. Approximately 250 Klbs. of material was removed from the pond. Since we are continuing to experience very dry conditions in Holden, the work was able to proceed without rain delay.

The next area to be addressed was the bermed areas to the west of the main warehouse. Gravel in those berms was removed without incident. The gravel that was underneath the five large storage tanks was found to be badly oil-stained in spots. Total dirt removed from the site as of September 1 was 688 Klbs. The work plan for the soil removal was approved by Steve Kinser subject to several modifications. The major concern was to ensure that contaminated dust would not leave the site. So far dust has not been a problem, but the operation is being closely monitored, and if dust is generated, we will hose the areas down to suppress it.

G. WATER DISPOSAL

No work was done in the pit during the month of August. The level in the pit was observed to rise about three inches after a heavy rain on August 22. Our long range plan is to maintain a charcoal adsorption system on the site to use in case the pit continues to collect water. We will also open the bermed area adjacent to the warehouse to keep rain water from standing there. This should reduce the amount of water coming through the floor of the pit.

H. RI/FS

CSI made its recommendation for contract award to the RI/FS task force in Denver on August 17. The task force endorsed that recommendation to the Technical Committee which in turn endorsed it to the Steering Committee. Steering Committee approval of Burns and McDonnell was given subject to a final interview of the contractor's project management team in Kansas City. That interview was successfully completed on August 25. The contract award date is now targeted for September 15.

I. HEALTH AND SAFETY

No lost time accidents occurred during the month of August. Air monitoring continues to show very low levels of dust.

J. SITE VISITS

One PRP group visited the site during August.

II. FORECAST OF SITE ACTIVITIES FOR SEPTEMBER

Rollins will complete all removal activities during the month. The biggest remaining problem is the removal of the large tanks in the pit. That activity will take place in early September and will involve the removal of a portion of the wall of the warehouse in order to get the tanks outside.

Major work remaining includes:

- . suck sludge from remaining tanks
- . remove portion of wall in the north warehouse to facilitate pulling the large tanks out of the pit
- . remove portion of wall of south warehouse to facilitate removing large tanks.
- . remove large tanks
- . wash and clean pit area: install sump
- . dismantle process equipment and bankruptcy trustee material for shipping
- . ship remaining sludge, drums, and debris
- . sweep and vacuum both warehouses
- . place EPA returned material in the south warehouse
- . restore building walls

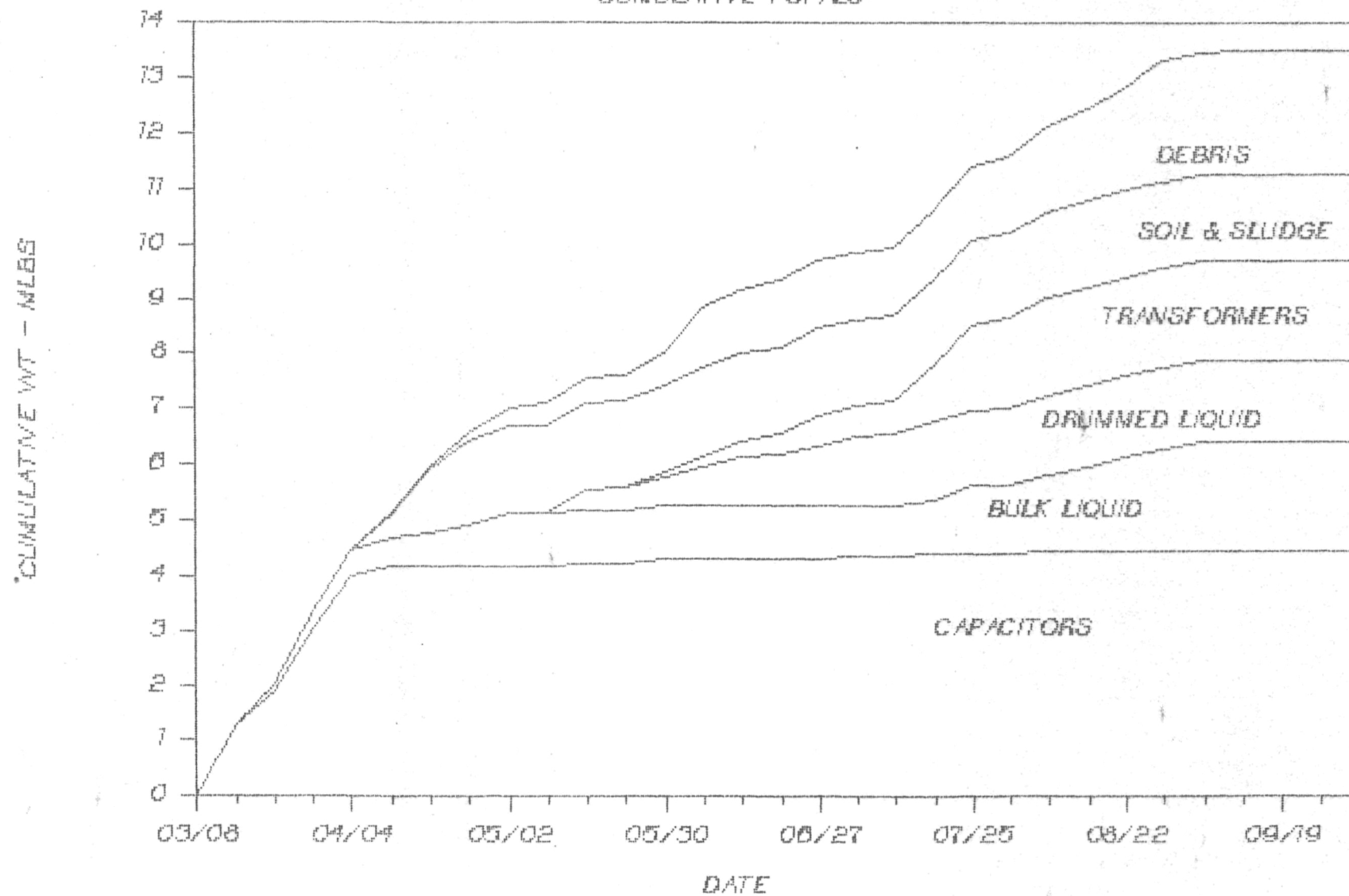
Dirt removal will continue and should be completed by the end of the month.

Rollins will demobilize and leave the site.

The RI/FS contractor will begin planning for field operations.

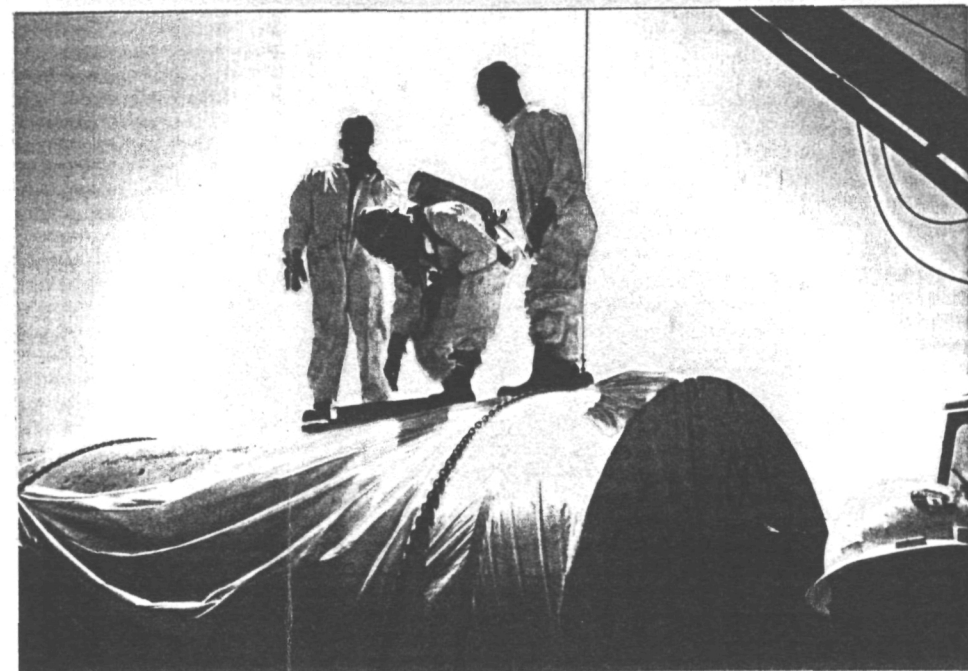
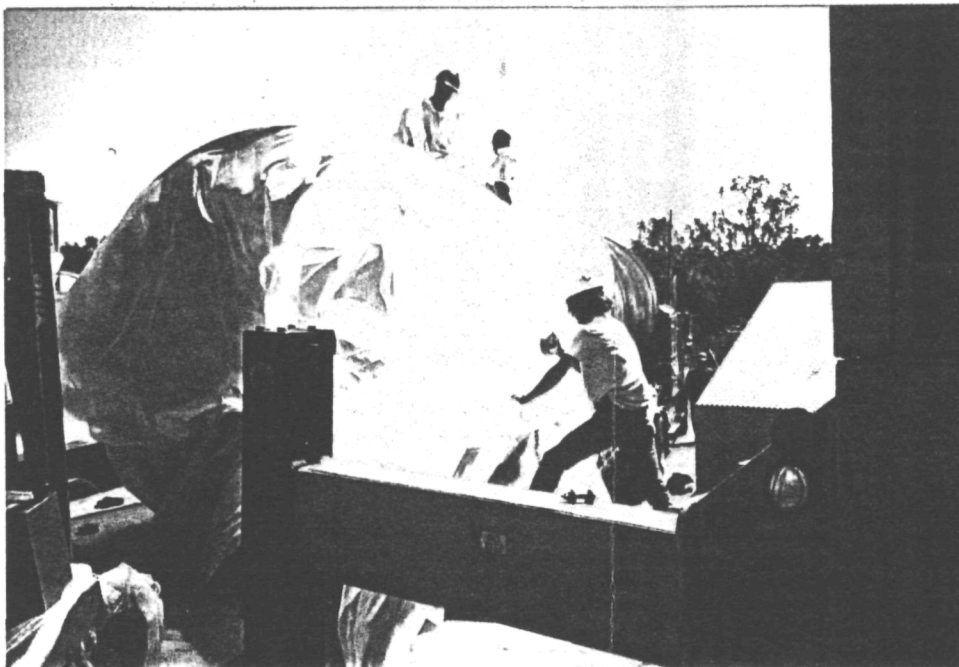
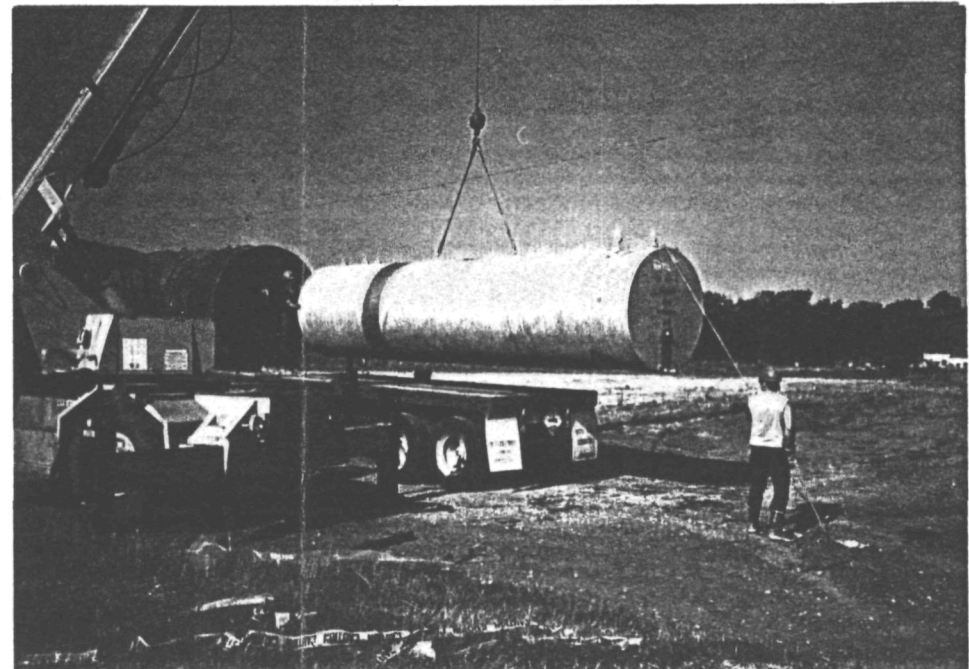
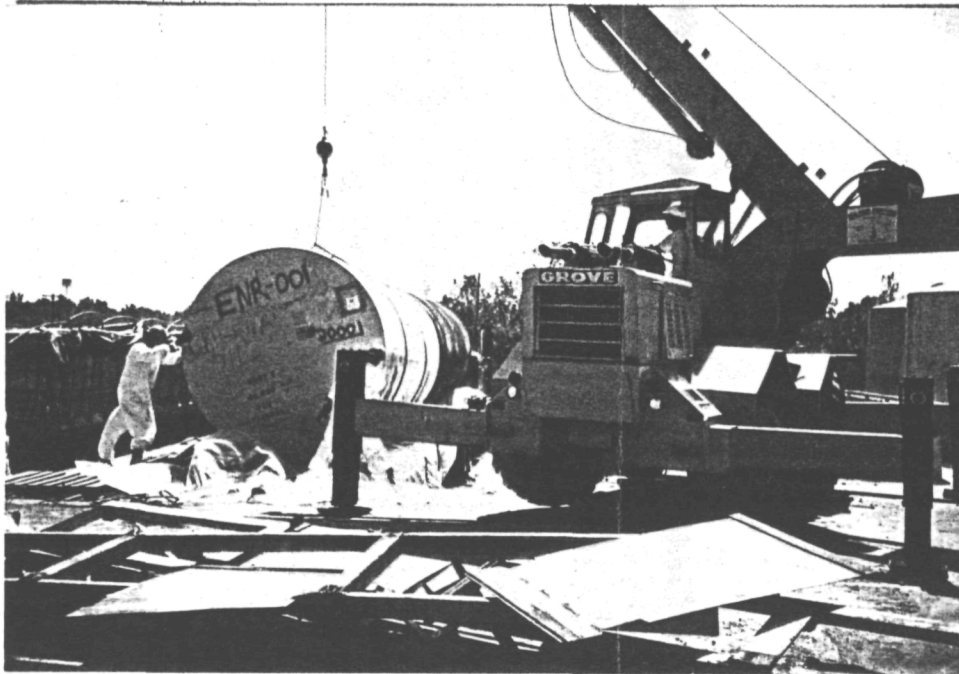
REMOVAL SUMMARY

CUMULATIVE TOTALS



9/1/88

PREPARING TANK FOR SHIPMENT



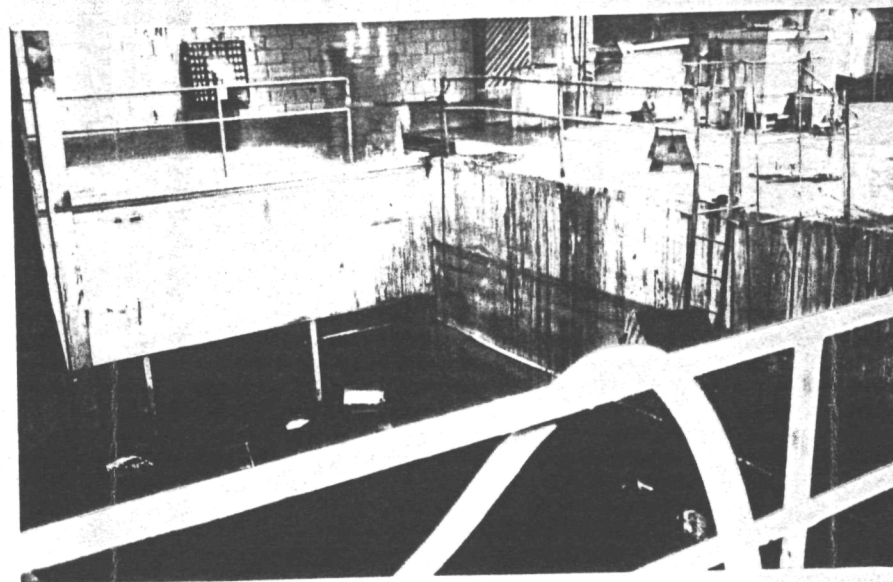
FLUE DUST FOR DRYING SOIL

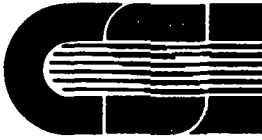


DIRT REMOVAL FROM POND



ONLY 2 TANKS LEFT IN THE PIT





CLEAN SITES INC

1199 NORTH FAIRFAX STREET / ALEXANDRIA VIRGINIA 22314 / 703-683-8522
TELECOPIER NO. 703-548-8773

October 17, 1988

Mr. Steven E. Kinser
Regional Project Manager
U.S.E.P.A.
Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101

SUBJECT: EPA SITE STATUS REPORT NO. 11
(AOC 87-F-0007)
ROSE CHEMICALS SITE

Dear Steve:

The EPA Site Status Report for the Rose Chemicals Site at Holden, Missouri, is attached. This report covers progress during September and early October, 1988. During that time, the Rollins part of the removal was completed, a significant milestone. The RI/FS is now underway, and these monthly reports will continue to report that activity.

Very truly yours,

Robin J. Robinson
CSI Project Manager

RJR/sjr

Enclosures:

cc: Mr. George Hess
U.S.E.P.A.
Region VII
25 Funston Road
Kansas City, KS 66115

Mr. Jim Kohanek, Clean Sites, Inc.

CHAIRMAN OF THE BOARD/Russell E. Train PRESIDENT/Thomas P. Grumbly BOARD OF DIRECTORS/Peter A.A. Berle,
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H. Eugene McBrayer, Gilbert S. Omenn, Charles W. Powers, William K. Reilly, Henry B. Schacht, Roger Strelow, Hans A. Wolf

PROJECT PROGRESS REPORT NO. 11
(AOC 87-F-0007)

ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR PERIOD AUGUST 1ST THROUGH OCTOBER 4TH 1988

HIGHLIGHTS

- o The removal work was completed on October 4, 1988. Cumulatively, 14.5 million pounds of contaminated material was removed under the Rollins contract, excluding the soil removal. In addition, approximately 4.0 million pounds of contaminated soil was removed and shipped to the Chemical Waste Management landfill in Alabama.
- o The pile of possibly contaminated material outside the fence was also sent to the CWM landfill.
- o The pit was cleaned and dried, and the main source of water - the sump - was cemented.
- o A kickoff meeting was held with Burns and McDonnell, the RI/FS contractor. They began work on QAPP and Health and Safety plans.

PROGRESS REPORT NO. 11
(ACP 87-F-0007)

ROSE CHEMICALS SITE - HOLDEN, MISSOURI

STATUS FOR SEPTEMBER, 1988

I. SITE ACTIVITIES

A. REMOVAL

The removal work was completed without major problems during September. Cumulatively, 14.5 million pounds of material have left the site, excluding soil.

The large pile of debris outside the south fence, consisting of tree roots, limbs, dirt and metal scraps, was picked up and hauled to the Chemical Waste Management landfill.

Almost the last work to be done consisted of cleaning the pit and repairing the sump which was discovered when the last of the water was removed. It turned out that the water in the pit was coming in through the sump. We plugged it with concrete, and so far, the pit has remained dry. Of course, there may be other leaks. We will observe what happens after a rain and take appropriate action. As a precautionary measure, we have set up a charcoal adsorption system. If water accumulates in the pit, it will be pumped through the charcoal filter and discharged into the storm water pond.

After all but the EPA-returned material had been removed from the warehouses, the floors were swept thoroughly. Except for the boat and the Bentley, all the EPA-returned material has been placed in the American Steel building. The Bentley remains in the south warehouse. Disposal of this material - roughly 250 k pounds - awaits further discussions between the Steering Committee and the EPA.

B. CERTIFICATES OF DESTRUCTION

Rollins continues to return CDs within the 60-day limit. The status of CDs as of October 10 is as follows:

<u>Shipment of:</u>	<u>Outstanding CDs (No.)</u>	<u>Oldest CD (Days)</u>
Scrap and Debris	19	47
Liquid	2	14
Capacitors	--	--
Sludge	2	19
Tanks	28	48
Soil	89	42
	<u>140</u>	

C. REMOVAL LOG

The total weight of material shipped during September and early October was 1.0 million pounds, excluding soil. As of October 4, 14.5 million pounds of material had been removed from the site. Quantities removed are shown in the table below which compares the amount of material actually removed in 6 categories with the inventory quantities of that material.

REMOVAL SUMMARY AS OF 10/10/88

<u>MATERIAL TYPE</u>	<u>ACTUAL WT.</u>	<u>INVENTORY WT.</u>	<u>DELTA %</u>
DEBRIS	3,592,740	2,276,135	58
TRANSFORMERS	1,922,270	1,677,544	15
LIQUID	3,610,210	4,323,826	-17
CAPACITORS	4,445,577	3,913,127	14
SLUDGE	402,920	182,346	121
TANKS	500,940	500,000	0
 TOTAL	 14,474,657	 12,872,978	 12

As reported last month, we removed a lot more debris than was shown in the inventory. However, 775 thousand pounds was material not included in the inventory. Subtracting that quantity reduces the debris overrun to 24 % and the total quantity overrun to 6.4 %.

The table above summarizes the Rollins removal quantities. In addition we removed 1,303,740 pounds of liquid under the Pyrochem (Aptus) early liquid removal contract and 93,715 pounds of sodium metal and flammable and corrosive liquids under the initial contract with CWM. Thus, the total quantity of material removed from the site, excluding the soil, is 15,872,112 pounds.

D. FBI DOCUMENTATION

The FBI asked for certain details of the removal -- exact quantities removed from the bag room, for example -- which have been supplied. We have not yet received their letter certifying completion of their program.

E. SOIL REMOVAL

The soil removal was completed on October 4. The last activity was the hand shovel work to remove a 2-inch layer of soil from all the grids. The biggest surprise during the work was a large quantity of oily soil discovered in the bermed area adjacent to the loading dock. We had to remove over 7 feet of soil and gravel from this "Spill Containment Area" to reach clean soil.

In all, 3.96 million pounds of soil was removed from the site. This soil was taken from all the areas which had shown PCB concentrations greater than 10 ppm in earlier testing. Thus, to the best of our knowledge, all the contaminated soil has been removed. However, no testing was done during or after the soil removal, so confirmation of the effectiveness of the dirt work must wait on the RI/FS testing program.

F. WATER DISPOSAL

A total of 65 thousand gallons of water from the pit was run through the charcoal adsorption system, tested, and dispersed on the site. When the pit was down to 2 or 3 inches, the remaining water and sludge was pumped into tankers and transported to Deer Park for incineration. The approach was both safe and cost-effective.

G. HEALTH AND SAFETY

One accident occurred during September. A worker was using a pocket knife to puncture the tires on a derelict trailer before shipping it to the landfill. The explosive release of air drove the knife into his side, but fortunately, it missed any vital organs. The man was hospitalized overnight and released the next day.

II. DEMOBILIZATION

Rollins decontaminated all their equipment which had been in the restricted zone under the observation of the EPA and Clean Sites. After the test results were received, the equipment was removed from the site.

The "break" trailer, which had only been used as a lunch room, was judged by Rollins to be clean. However, the owner requested that a wipe test be taken. Rollins refused but the impasse was resolved when the owner agreed to accept earlier test results taken by OSHA inspectors.

The digital scales were decontaminated and sold back to the manufacturer for roughly 20% of the original value.

III. SITE CONDITION

South Warehouse - completely empty except for the 1931 Bentley. Swept throughout (since this is a favorite pigeon roost, the clean floors will not last long).

Main Warehouse - all generator-sent material is gone. All process equipment, offices and office equipment, and heavy presses are gone. EPA-returned material is stored in the American Steel building (northeast part of Main Warehouse). The building is completely swept. The pit is dry with a pump in the sump hooked to a charcoal adsorption system. The overhead crane remains in working order in the American Steel building.

Outside the buildings - all debris removed. Berms have been opened to allow rainwater to flow into stormwater ponds. The houseboat is sitting just to the north of the South Warehouse.

IV. FORECAST OF SITE ACTIVITIES FOR OCTOBER

Burns and McDonnell will visit the site to familiarize their team members with site conditions. No field work is anticipated.

The Rollins trailer and the second CSI trailer will be removed from the site. The main trailer will remain for the time being.

A town meeting will be held on October 25 to report on the completion of the removal and to inform citizens of the next phase of the work.

V. COST REPORT - END OF SEPTEMBER

Total cumulative expenditures including accruals through the end of September, total 11,983 k\$. Expenditures and a forecast of costs for the next four months are shown in the attached cost report.

A. CHANGE ORDERS

Five additional change orders were approved during September and early October. The main ones were for the final cleaning of the pit and the buildings and for removing and replacing a portion of the west wall of the building to remove the large tanks in the pit. The 35 approved change orders total 257 k\$ or 4.7% of the revised contract of 5.5 m\$.

B. CONTRACT COST FORECAST

The table below shows how the cost forecast of 5.7 m\$ is arrived at.

	<u>August</u>	<u>September</u>
Revised contract	5504	5504
Contingency Rundown	-512	-512
Change Orders	207	257
Changes due to Weight Differences		
o Liquids	-164	- 26
o Capacitors	307	307
o Landfill	218	200
New Forecast	5560 k\$	5730 k\$

The increase over last month's forecast is due to late, cleaning up type change orders and the greater-than-anticipated amounts of sludge and debris discovered. The quantity of debris outside the fence was also a factor.

VI. HOME OFFICE ACTIVITIES

A. PROJECT MANAGEMENT AND TECHNICAL SERVICES

Following is a brief summary of key project management and technical activities performed by the CSI home office during September.

o RI/FS Contracting

Developed the final contract with Burns & McDonnell. Notified the unsuccessful bidders, and invited them to a debriefing.

B. COALESCING, ALLOCATION AND ADMINISTRATIVE SERVICES

o Buyout/Consent Party Offer

- Total receipt to date of approximately 560 buyout consent party agreements, along with checks of approximately \$12.5 million.
- Prepared background material and correspondence package regarding various PRP requests for review of Buyout Task Group in conference calls.
- Prepared mailing to uncommitted PRPs as to clarifications of buyout/consent party offer.
- Handled telephone calls and correspondence from PRPs regarding the buyout/consent party offer.

o Meetings

- Prepared background material for options to be considered as to interest attribution under buyout/consent party offer for upcoming meeting of Audit Subcommittee.

o Lists of Participating and Non-Participating PRPs

- CSI prepared the lists of Participating and Non-participating PRPs required to be submitted to EPA by the Administrative Order on Consent.

o Fund Administration

- Continued administration of receipt of funds from the buyout/consent party offer.



CLEAN SITES INC

1199 NORTH FAIRFAX STREET / ALEXANDRIA VIRGINIA 22314 / 703-683-8522
TELECOPIER NO. 703-548-8773
MIDWEST REGIONAL OFFICE: 1400 E. TOUHY AVENUE / SUITE 215 / DES PLAINES, IL 60018 / 312-635-7580

Reviewed 10/25/88
GRTA

Advisory

Public Meeting October 25 on Martha C. Rose Chemicals Site

A meeting will be held October 25 to discuss the status of the cleanup of the Martha C. Rose facility in Holden, Mo. The meeting will begin at 7:30 p.m. at the Holden City Hall, 101 W. 3rd St., Holden, Mo.

Speakers at the meeting will be Holden Mayor Francis Brillhart and representatives from the Rose Chemicals Site Steering Committee, which is conducting the cleanup, and from Clean Sites Inc., which is managing the cleanup.

They will discuss the recent removal of 18 million pounds of materials contaminated by polychlorinated biphenyls (PCBs) and will explain the purpose of a study, which has begun, to evaluate any remaining contamination. In addition to the speakers, representatives from the Environmental Protection Agency will be available to answer questions from citizens and press.

For further information on the site, see the enclosed fact sheet.



CLEAN SITES INC

1199 NORTH FAIRFAX SYREET / ALEXANDRIA VIRGINIA 22314 / 703-683-8522
TELECOPIER NO. 703-548-8773

November 15, 1988

Mr. Steven E. Kinser
Regional Project Manager
U.S.E.P.A.
Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101

SUBJECT: EPA SITE STATUS REPORT NO. 12
(AOC 87-F-0007)
ROSE CHEMICALS SITE

Dear Steve:

The EPA Site Status Report for the Rose Chemicals Site at Holden, Missouri, is attached. This report covers progress during November, 1988.

Very truly yours,

Robin J. Robinson
CSI Project Manager

RJR/sjr

Enclosures:

cc: Mr. George Hess
U.S.E.P.A.
Region VII
25 Funston Road
Kansas City, KS 66115

Mr. Jim Kohanek, Clean Sites, Inc.

PROJECT PROGRESS REPORT NO. 12
(AOC 87-F-0007)

ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR PERIOD OCTOBER 5TH THROUGH OCTOBER 31ST 1988

HIGHLIGHTS

- o A town meeting was held on October 25 in the Holden Town Hall. CSI reported the successful completion of the removal followed by a brief description of plans and schedule for the RI/FS. The small crowd seemed pleased with the progress to date.
- o Burns & McDonnell have prepared drafts of the Health & Safety Plan, the Quality Assurance Project Plan, and the Sampling Analysis Plan. These are being reviewed by the RI/FS Task Force.

PROGRESS REPORT NO. 12
(AOC 87-F-0007)

ROSE CHEMICALS SITE - HOLDEN, MISSOURI

STATUS FOR OCTOBER, 1988

I. REMOVAL ACTIVITIES - FOLLOWUP

A. "BURIED DRUM" REMOVAL

As a part of the soil removal program, we excavated the area west of the Main Warehouse where the buried drum lid was encountered by Mathes while drilling one of the monitoring wells. Based on ground penetrating radar tests, we anticipated finding two or three buried metal objects, the so-called "buried drums". The Rollins backhoe operator wore level B protection during the operation. However, all we found was some scrap metal. It was shipped to the Chemical Waste Management landfill along with the dirt.

Nearby we uncovered a large cylindrical object filled with charcoal. It was connected to the outfall of one of the bermed areas and appeared to be designed to remove PCB contamination from water leaving the berm. It too was sent to the landfill.

B. DATABASE DOCUMENTATION

Rollins began removing the extraneous records from their removal database. The problem came about because as articles were removed from the site (and entered into the computer), the original item in the database which showed a scale weight of 0 was not replaced. The result was duplicate article numbers, one showing scale weight = 0 and the other showing scale weight = the weight punched into the warehouse mini computer.

Rollins should have the problem solved by mid-November. They will deliver the cleaned up database on floppy disks to Clean Sites in Holden. After they are checked, copies of these dBase3+ files will be made available to the EPA and the FBI.

C. CERTIFICATES OF DESTRUCTION

All but four Certificates of Disposal had been received by November 7. The missing four from the landfill were mailed by Chemical Waste Management but not received by Rollins who is now checking.

II. RI/FS

Burns & McDonnell inspected the site on October 3 to familiarize workers and to plan the field portion of RI/FS Work.

They have drafted Health & Safety, Quality Assurance, and Site Sampling and Analysis Plans. These are currently being reviewed by the RI/FS Task Force prior to being submitted to the EPA.

Burns & McDonnell also prepared short lists for the laboratory and the drilling subcontractor for the project. RFPs will be issued in November.

III. TOWN MEETING

The town meeting on October 25 was a non-event in many ways as no more than 20 citizens showed up. This, in itself, was testimony to the general satisfaction with the progress made in the cleanup.

The Rose Steering Committee was represented by Jene Robinson, the EPA by Steve Kinser and Michael Kosakowski, the MDNR by Jim Bell, and Clean Sites by Joan Ebzery and Robin Robinson. Mayor Brillhart, several press and TV reporters, Gene Senat of Rollins, and Paul Hustad of Burns & McDonnell were also present.

- o We reported on the site status and showed "before" and "after" slides of the Rose site. We then discussed the plans for conducting the RI/FS and gave the overall schedule for doing the work. Jene Robinson expressed the PRPs' satisfaction that the significant hazard at the site, the contaminated liquids and solids, has been removed. Steve Kinser commented favorably on the work to date.
- o Only a few questions were asked during the open discussion period. The general mood was one of quiet satisfaction.

IV. FORECAST OF SITE ACTIVITIES FOR NOVEMBER

- o The Clean Sites trailer should be removed and the office relocated to Second Street in Holden, about 1-1/2 blocks from the site. Jerry Hollingsworth will be the only full time Clean Sites employee in Holden. He will remain through the Burns & McDonnell sampling program, estimated to take about four months.
- o No site activities are anticipated. Burns & McDonnell should begin sampling during December.



CLEAN SITES INC

1199 NORTH FAIRFAX STREET / ALEXANDRIA VIRGINIA 22314 / 703-683-8522
TELECOPIER NO. 703-548-8773

December 15, 1988

Mr. Steven E. Kinser
Regional Project Manager
U.S.E.P.A.
Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101

SUBJECT: EPA SITE STATUS REPORT NO. 13
(AOC 87-F-0007)
ROSE CHEMICALS SITE

Dear Steve:

The EPA Site Status Report for the Rose Chemicals Site at Holden, Missouri, is attached. This report covers progress during November, 1988.

Very truly yours,

Robin J. Robinson
CSI Project Manager

RJR/sjr

Enclosures:

cc: Mr. George Hess
U.S.E.P.A.
Region VII
25 Funston Road
Kansas City, KS 66115

Bob Morby
U.S.E.P.A.
Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101

Mr. Jim Kohanek, Clean Sites, Inc.

PROJECT PROGRESS REPORT NO. 13
(AOC 87-F-0007)

ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR PERIOD NOVEMBER 1ST THROUGH NOVEMBER 30TH 1988

HIGHLIGHTS

- o The corrected removal database was received from Rollins.
- o The Quality Assurance Project Plan, the Health & Safety Plan, and the Sampling & Analysis Plan were submitted to the EPA for review.
- o Field activities are scheduled to start in early January, 1989.

PROGRESS REPORT NO. 13
(AOC 87-F-0007)

ROSE CHEMICALS SITE - HOLDEN, MISSOURI

STATUS FOR NOVEMBER, 1988

I. REMOVAL ACTIVITIES - FOLLOWUP

A. DATABASE DOCUMENTATION

Rollins had difficulty in cleaning up the removal database but completed the job early in December. The database was transmitted to Clean Sites on a single floppy disk in a "packed" configuration. The file can be restored on a hard disk using the "UNDO" command, at which time it is a dBASE III+ file. The database has not yet been checked thoroughly but will be provided to both the EPA and the FBI during December.

B. CERTIFICATES OF DESTRUCTION

All Certificates of Destruction or Disposal have been received by Clean Sites. All were received within the 60-day limit required under the Administrative Order.

C. SITE SECURITY

The EPA has informed Sheldon Zabel that it would not agree to reduce the requirement for 24-hour security at the site as long as the returned material remains on site. Around-the-clock coverage continues.

II. RI/FS

A. Plan Development

Burns and McDonnell completed revision of the Quality Assurance Project Plan (QAPP), the Health & Safety Plan (HSP), and the Sampling and Analysis Plan (SAP). These documents were submitted to US EPA for their review on December 1 and December 5, 1988. We have tentatively scheduled a meeting with EPA for December 22 in their office to receive preliminary feedback on the plans. This meeting will allow Burns & McDonnell to recycle the plans before year-end in order to begin field work in the first week in January.

Burns & McDonnell completed a draft of the Data Management Plan in early December. That plan is currently being reviewed by the RI/FS Task Force prior to submission to the EPA.

Harry Walton (Illinois Power), Tom Brown and Steve Kidwell (Burns & McDonnell), and Jerry Hollingsworth and Robin Robinson (CSI) visited the EMS lab and reviewed their sample handling and QA/QC procedures prior to awarding them the contract for the lab work for the project. Their procedures appear to meet our requirements.

B. Schedule

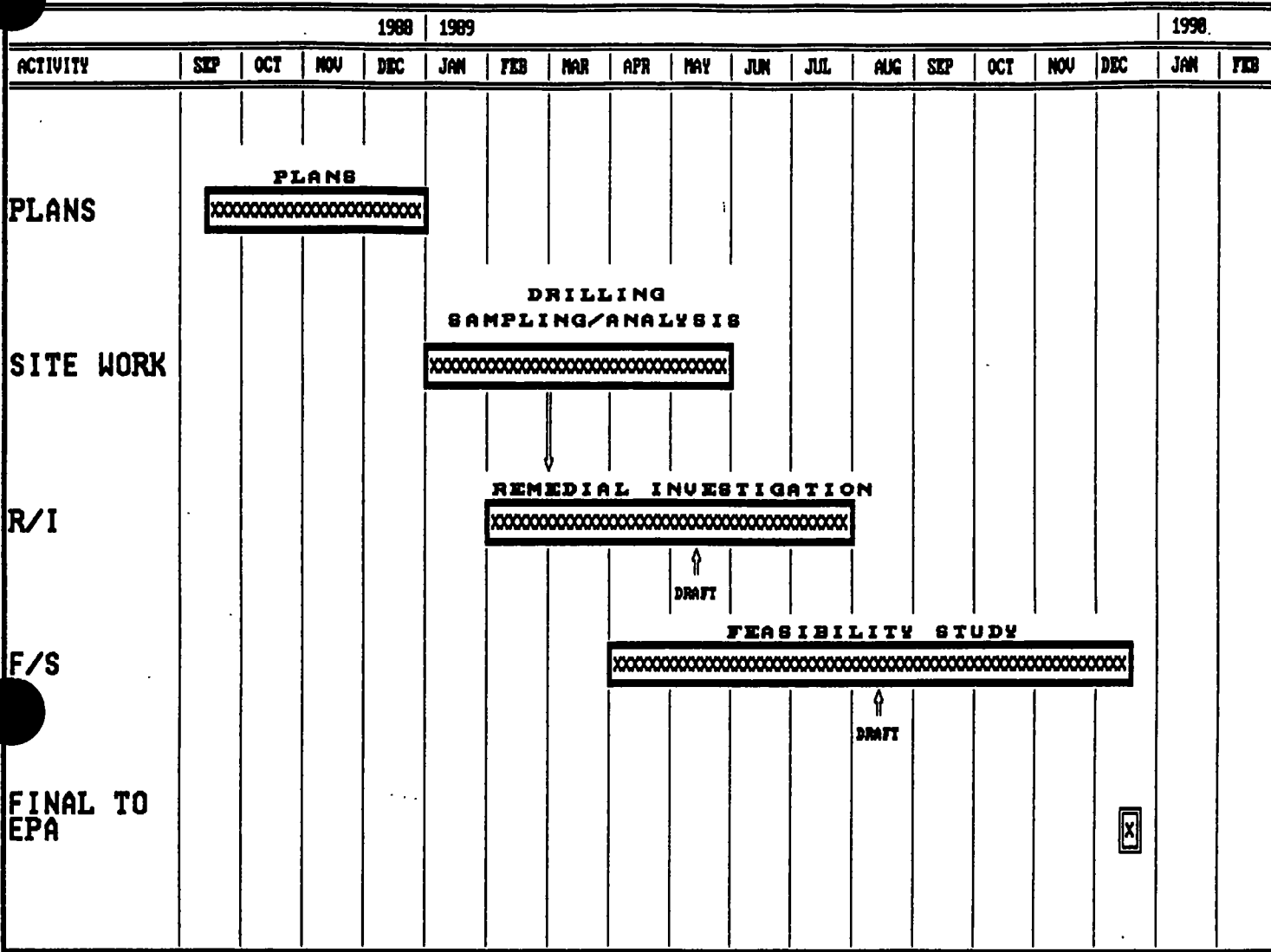
Figure 1 shows the overall RI/FS schedule through the end of 1989. The field start has been delayed until January 3 (assuming approval of HSP and QAPP), but the overall schedule will not slip because Burns & McDonnell plan to overlap the drilling and sampling programs. Those two programs provide data for the RI Report. The current plan calls for a two-month sampling period followed by an analysis period extending through March and part of April. The last two months of the site work is a provision for additional testing based on the preliminary results. Assuming a normal schedule, a draft of the RI Report should be available in mid-May. The additional time shown is for EPA review and subsequent revision to the work. The Feasibility Study draft should be available in mid-August. That draft will also be reviewed by EPA followed by a public comment period and revisions leading to the final report in mid-December, 1989.

III. FORECAST OF SITE ACTIVITIES FOR DECEMBER

- o The Clean Sites office will be moved from the site to 2nd Street in Holden, Missouri. The phone number will remain the same.
- o No site activities are anticipated. The drilling and sampling program will begin in January.

FIGURE 1

ROSE CHEMICALS SITE RIFS SCHEDULE





CLEAN SITES INC

1199 NORTH FAIRFAX STREET / ALEXANDRIA VIRGINIA 22314 / 703-683-8522
TELECOPIER NO. 703-548-8773

January 13, 1989

Mr. Steven E. Kinser
Regional Project Manager
U.S.E.P.A.
Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101

SUBJECT: EPA SITE STATUS REPORT NO. 14
(AOC 87-F-0007)
ROSE CHEMICALS SITE

Dear Steve:

The EPA Site Status Report for the Rose Chemicals Site at Holden, Missouri, is attached. This report covers progress during December, 1988.

Very truly yours,

Robin J. Robinson
CSI Project Manager

RJR/sjr

Enclosures:

cc: Mr. George Hess
U.S.E.P.A.
Region VII
25 Funston Road
Kansas City, KS 66115

Bob Morby
U.S.E.P.A.
Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101

Mr. Jim Kohanek, Clean Sites, Inc.

PROJECT PROGRESS REPORT NO. 14
(AOC 87-F-0007)

ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR PERIOD DECEMBER 1ST THROUGH DECEMBER 31ST 1988

HIGHLIGHTS

- o The removal database was submitted to the EPA in floppy disk form.
- o Items requiring revision in the Quality Assurance Project Plan, the Health & Safety Plan, and the Sampling & Analysis Plan were identified by the EPA and modified accordingly; the final documents were re-submitted to the EPA for review.
- o Drilling and sampling activities at the Site began in early January, 1989.

PROGRESS REPORT NO. 14
(AOC 87-F-0007)

ROSE CHEMICALS SITE - HOLDEN, MISSOURI

STATUS FOR DECEMBER, 1988

I. REMOVAL ACTIVITIES - FOLLOWUP

A. DATABASE DOCUMENTATION

The removal database received from Rollins was restored to the form of a dBASE III+ file. Checking is in progress. The data have also been transferred to Clean Sites' main computer in Alexandria. The database was submitted to the EPA and the FBI in early January.

B. EPA-RETURNED MATERIALS

A letter was received from Rollins making an offer to take possession of the so-called EPA-returned materials at no cost to the PRPs. Clean Sites will coordinate the decision-making, reviews, and administrative steps that must be accomplished before a final response to that offer can be given. Assuming no major problems, removal of the materials from the Site should occur in February 1989.

II. RI/FS

A. Plan Development

As noted in Progress Report No. 13, Burns and McDonnell's revised Quality Assurance Project Plan (QAPP), Health & Safety Plan (HSP), and Sampling and Analysis Plan (SAP) were submitted to US EPA early in December. A meeting was held with EPA on December 22, during which feedback on the plans was received. Burns and McDonnell made further revisions in accordance with the EPA comments, and the resulting plans were again submitted to EPA on January 9, 1989. A prompt reply is expected.

The RI/FS Task Force began its review of the Data Management Plan prepared by Burns and McDonnell. That plan will be submitted to the EPA early in January.

B. Schedule

Figure 1 shows the overall RI/FS schedule through the end of 1989. The schedule is unchanged from last month.

III. SITE ACTIVITIES FOR JANUARY

- o The drilling and sampling program began on January 3 and will be more fully reported in Progress Report No. 15.

ROSE CHEMICALS SITE														RIFS SCHEDULE					
1988												1989		1990					
ACTIVITY	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	
PLANS	<div>PLANS</div> <div>XXXXXXXXXXXXXXXXXXXX</div>																		
SITE WORK					<div>DRILLING</div> <div>SAMPLING/ANALYSIS</div> <div>XX</div>														
R/I					<div>↓</div> <div>REMEDIAL INVESTIGATION</div> <div>XX</div>														
F/S					<div>↑</div> <div>DRAFT</div> <div>FEASIBILITY STUDY</div> <div>XX</div>														
FINAL TO EPA									<div>↑</div> <div>DRAFT</div>										

FIGURE 1



CLEAN SITES INC

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TELECOPIER NO. 703-548-8773
MIDWEST REGIONAL OFFICE: 1400 E. TOUHY AVENUE / SUITE 215 / DES PLAINES, IL 60018 / 312-635-7580

February 16, 1989

Mr. Steven E. Kinser
Regional Project Manager
U.S.E.P.A.
Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101

SUBJECT: EPA SITE STATUS REPORT NO. 15
(AOC 87-F-0007)
ROSE CHEMICALS SITE

Dear Steve:

The EPA Site Status Report for the Rose Chemicals Site at Holden, Missouri, is attached. This report covers progress during January, 1989.

Very truly yours,

Robin J. Robinson
CSI Project Manager

RJR/sjr

Enclosures:

cc: Mr. George Hess
U.S.E.P.A.
Region VII
25 Funston Road
Kansas City, KS 66115

Bob Morby
U.S.E.P.A.
Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101

Mr. Jim Kohanek, Clean Sites, Inc.

PROJECT PROGRESS REPORT NO. 15
(AOC 87-F-0007)

ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR PERIOD JANUARY 1ST THROUGH JANUARY 31ST, 1989

HIGHLIGHTS

- o All the sampling at the site was completed in January. The only remaining site work is development of the wells which was delayed until early February due to extreme cold.
- o Bids have been received for the endangerment assessment work.
- o The Quality Assurance Project Plan (QAPP), the Sampling and Analysis Plan (SAP), and the Health and Safety Plan (HSP) were approved by the EPA on February 1.
- o The Data Management Plan was submitted to EPA for approval on February 3, 1989.

PROGRESS REPORT NO. 15
(AOC 87-F-0007)

ROSE CHEMICALS SITE - HOLDEN, MISSOURI

STATUS FOR JANUARY, 1989

I. REMOVAL ACTIVITIES - FOLLOWUP

Plans are being made for removing the EPA-returned materials. A Release and Indemnification form has been drafted and submitted to Rollins for their execution. Clean Sites and Sheldon Zabel are currently drafting the modifications to A02 which will be necessary before the material can be removed. A modified Work Plan is being prepared by Rollins. A modification to the site security provisions has been drafted and is being reviewed by Sheldon and Gary Johnson.

II. RI/FS

A. Plan Development

The Quality Assurance Project Plan, the Sampling and Analysis Plan, and the Health and Safety Plan were approved as modified by EPA on February 1.

The Data Management Plan was submitted to EPA for approval on February 3.

A Data Validation Technical Memo is being developed. Work on this item was given lower priority in the interest of getting the various plans necessary for field implementation prepared and approved.

B. Site Activities

During January the Contractor carried out all of the sampling work specified in the Work Plan with the exception of monitoring well sampling.

All the groundwater monitoring wells have been drilled. Development of the wells was delayed until early February due to the extremely cold weather during the last week in January.

All interior and exterior soil borings have been completed. Samples have been submitted to the EMS Laboratory for analysis.

The surface samples have been completed. These include seven surface tracking samples, nine sewer samples, thirty-five sediment samples, and fifty-four surface soil samples. The plan called for 11 sewer samples, but two of the sewers had no sediment in them and so were not sampled.

Thirty-five wipe samples for walls and roof exterior surfaces have been completed.

As of January 31, few samples had been analysed.

III. SITE ACTIVITIES FOR FEBRUARY

- o Well development will be completed.
- o Evaluation of analytical results will begin.



CLEAN SITES INC

1199 NORTH FAIRFAX STREET / ALEXANDRIA VIRGINIA 22314 / 703-683-8522

TELECOPIER NO. 703-548-8773

MIDWEST REGIONAL OFFICE. 1400 E TOUHY AVENUE / SUITE 215 / DES PLAINES, IL 60018 / 312-635-7580

March 16, 1989

Mr. Steven E. Kinser
Regional Project Manager
U.S.E.P.A.
Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101

SUBJECT: EPA SITE STATUS REPORT NO. 16
(AOC 87-F-0007)
ROSE CHEMICALS SITE

Dear Steve:

The EPA Site Status Report for the Rose Chemicals Site at Holden, Missouri, is attached. This report covers progress during February, 1989.

Very truly yours,

Robin J. Robinson
CSI Project Manager

RJR/sjr

Enclosures:

cc: Mr. George Hess
U.S.E.P.A.
Region VII
25 Funston Road
Kansas City, KS 66115

Bob Morby
U.S.E.P.A.
Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101

Mr. Jim Kohanek, Clean Sites, Inc.

PROJECT PROGRESS REPORT NO. 16
(AOC 87-F-0007)

ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR PERIOD FEBRUARY 1ST THROUGH FEBRUARY 28TH, 1989

- o Analytical results are now being returned on the first set of field samples. There are no major surprises so far in the results.
- o The RI/FS Task Force has decided that additional sediment samples should be taken in East Pin Oak Creek.

PROGRESS REPORT NO. 16
(AOC 87-F-0007)

ROSE CHEMICALS SITE - HOLDEN, MISSOURI

STATUS FOR FEBRUARY, 1989

I. REMOVAL ACTIVITIES - FOLLOWUP

Rollins prepared a modification to the Removal Work Plan for the removal and decontamination of the EPA-returned material. That Work Plan Amendment was completed in early March after which several approvals are necessary before the removal can take place.

II. RI/FS

A. Plan Development

The Existing Data Technical Memorandum is nearing completion. It should be ready for review by the RI/FS Task Force and submission to EPA during March.

B. Site Activities

The locations and elevations of all monitoring wells have been established and recorded.

The eight new pairs of monitoring wells were developed during the month. Sampling began on all wells and was completed in early March.

Eight insulation cores were taken in early March and were sent to the laboratory for PCB analysis.

Burns & McDonnell reviewed the bids from prospective Endangerment Assessment (EA) contractors and recommended a winner to the RI/FS Task Force. The Task Force's decision will be made in early March after which EPA approval is required.

C. Analytical Results

Preliminary results from the outside soil sampling program indicate that while the surface soil removal reduced PCB concentrations in some areas below 10 ppm, in a number of other areas concentrations ranged between 10 and 50 ppm and in several areas concentrations exceeded 50 ppm. These data were reviewed by the RI/FS Task Force in a meeting in Kansas City on March 9.

Concrete core samples indicated moderate PCB concentrations in most samples taken in the two warehouses. The top 1/2 inch of each core was analysed. Further analysis will be done in March.

Soil samples beneath the floor of the main warehouse have, in general, indicated very low or zero PCB concentrations. In many cases, however, elevated VOC readings were obtained. A more detailed assessment of the situation beneath the floor in the main warehouse will await the completion of analytical results.

Sediment samples in the unnamed tributary and in East Pin Oak Creek indicated some PCB concentrations greater than 50 ppm. The RI/FS Task Force endorsed taking additional samples farther downstream in East Pin Oak Creek to establish the extent of the problem.

III. SITE ACTIVITIES FOR MARCH

- o Analytical results will continue to be received and organized.
- o The RI/FS Task Force in conjunction with Burns & McDonnell will decide with EPA concurrence on the need for additional sampling.
- o A contract will be awarded to the EA contractor subject to EPA approval.



CLEAN SITES INC

1199 NORTH FAIRFAX STREET / ALEXANDRIA VIRGINIA 22314 / 703-683-8522
TELECOPIER NO. 703-548-8773
MIDWEST REGIONAL OFFICE: 1400 E. TOUHY AVENUE / SUITE 215 / DES PLAINES, IL 60018 / 312-635-7580

April 18, 1989

Mr. Steven E. Kinser
Regional Project Manager
U.S.E.P.A.
Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101

SUBJECT: EPA SITE STATUS REPORT NO. 17
(AOC 87-F-0007)
ROSE CHEMICALS SITE

Dear Steve:

The EPA Site Status Report for the Rose Chemicals Site at Holden, Missouri, is attached. This report covers progress during March, 1989.

Very truly yours,

Robin J. Robinson
CSI Project Manager

RJR/sjr

Enclosures:

cc: Mr. George Hess
U.S.E.P.A.
Region VII
25 Funston Road
Kansas City, KS 66115

Bob Morby
U.S.E.P.A.
Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101

Mr. Jim Kohanek, Clean Sites, Inc.

PROJECT PROGRESS REPORT NO. 17
(AOC 87-F-0007)

ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR PERIOD MARCH 1ST THROUGH MARCH 31ST, 1989

HIGHLIGHTS

- o The first round of sampling was completed; analytical results will be complete in early April.
- o PCBs were found in water samples from four monitoring wells out of 22. The concentrations ranged from 3-30 ug/l.
- o Low levels of PCBs were found in some of the creek water samples.
- o PCBs were found in sediment samples from the stream bed near the site to a point 400 feet downstream of the Publicly Owned Treatment Works (POTW). Samples downstream of that point (for the next 900 feet) were clean of PCBs.
- o "Biased" concrete cores from the Main Warehouse floor where visible staining exists were extremely high in PCBs.
- o Soil samples outside the buildings showed PCBs ranging from less than 10 ppm to about 540 ppm.
- o Surface wipe samples in the streets outside the fence were relatively low, less than 10 ug/wipe.

PROGRESS REPORT NO. 17
(AOC 87-F-0007)

ROSE CHEMICALS SITE - HOLDEN, MISSOURI

STATUS FOR MARCH, 1989

I. REMOVAL ACTIVITIES - FOLLOWUP

The modification to the Removal Work Plan for the removal and decontamination of the EPA-returned material has been revised to make the document self-contained. The revision will be reviewed in early April by Sheldon Zabel prior to resubmission to the EPA.

II. RI/FS

A. Plan Development

The Existing Data Validation Technical Memorandum was partially completed by Burns and McDonnell. It will be submitted to the RI/FS Task Force for review during April.

B. Site Activities

1. Monitoring Wells

All onsite monitoring wells were developed by bailing.

The first round of monitoring wells samples was completed. Four wells indicated detectable levels of PCBs. PCBs in the 3-10 ug/l range were detected in monitoring wells 102, 110, and 202. Monitoring well 207 showed PCB concentrations around 30 ug/l. These results are not considered conclusive at this time. The second and third rounds of sampling will either confirm or deny the presence of PCBs.

2. Creek Sediment Samples

Ten additional sediment samples (at 100 foot spacing) were taken in East Pin Oak Creek downstream of the original sample points. No PCBs were detected in the new samples. Thus, the farthest downstream that PCBs were detected is 400 feet below the POTW.

In response to her requests, Mrs. Anderson's spring (or cistern) adjacent to the site's western boundary was sampled. The result indicated 6.7 ug/l PCBs plus a small amount of acetone. Because of the uncertainty as to how long the water had been standing in the cistern, the RI/FS Task Force recommended that the water be purged to the greatest extent possible and then the spring be resampled after refilling. That work will take place in April.

3. Warehouse Core Samples

Additional concrete core samples were taken from the visually contaminated areas inside the Main Warehouse. These cores showed extremely high PCB concentrations. The highest reading was 670,000 mg/kg. These cores were sampled in half inch slices. In general, the first half inch indicated the highest PCB concentration. The concentrations declined steadily and rapidly through the second, third and fourth slices. Nevertheless, the general conclusion is that in certain areas of the building where spills occurred, the concrete floor is highly contaminated.

Beneath the floor, on the other hand, PCB concentrations are either very low or below detection limit with one exception: location B-12, outside on the west loading dock, showed PCBs in the 1700 ppm range. The source of this contamination has not been nailed down completely.

4. Wipe Samples

Interior floor wipe sample analyses indicated a large number of samples with high levels of PCBs. The highest recorded level was 1,160,000 ug/wipe (In all cases, the wipe area was 100 sq. cm.).

Ceiling wipe sample results ranged between 1 and 82 ug/wipe. Exterior wipe samples were generally low (less than 10 ug/wipe, although one sample was 20). The highest wall wipe sample concentration was 3,390 ug/wipe.

5. Insulation Cores

Results from ceiling insulation cores were difficult to quantify. However, a number of cores showed PCB concentrations in the range of 1000-20,000 ug per sample. Burns and McDonnell is attempting to quantify these readings.

6. Soil Samples

Soil samples outside the building showed significant variability in the results of the soil removal program. That is shown in Figure 1 which indicates concentrations in three ranges: <10; 10-25; >25 mg/kg.

7. Surface Tracking Samples

Wipe samples were taken in McKissock Street and on Highway 58 outside the site. All samples were below 10 ug/wipe.

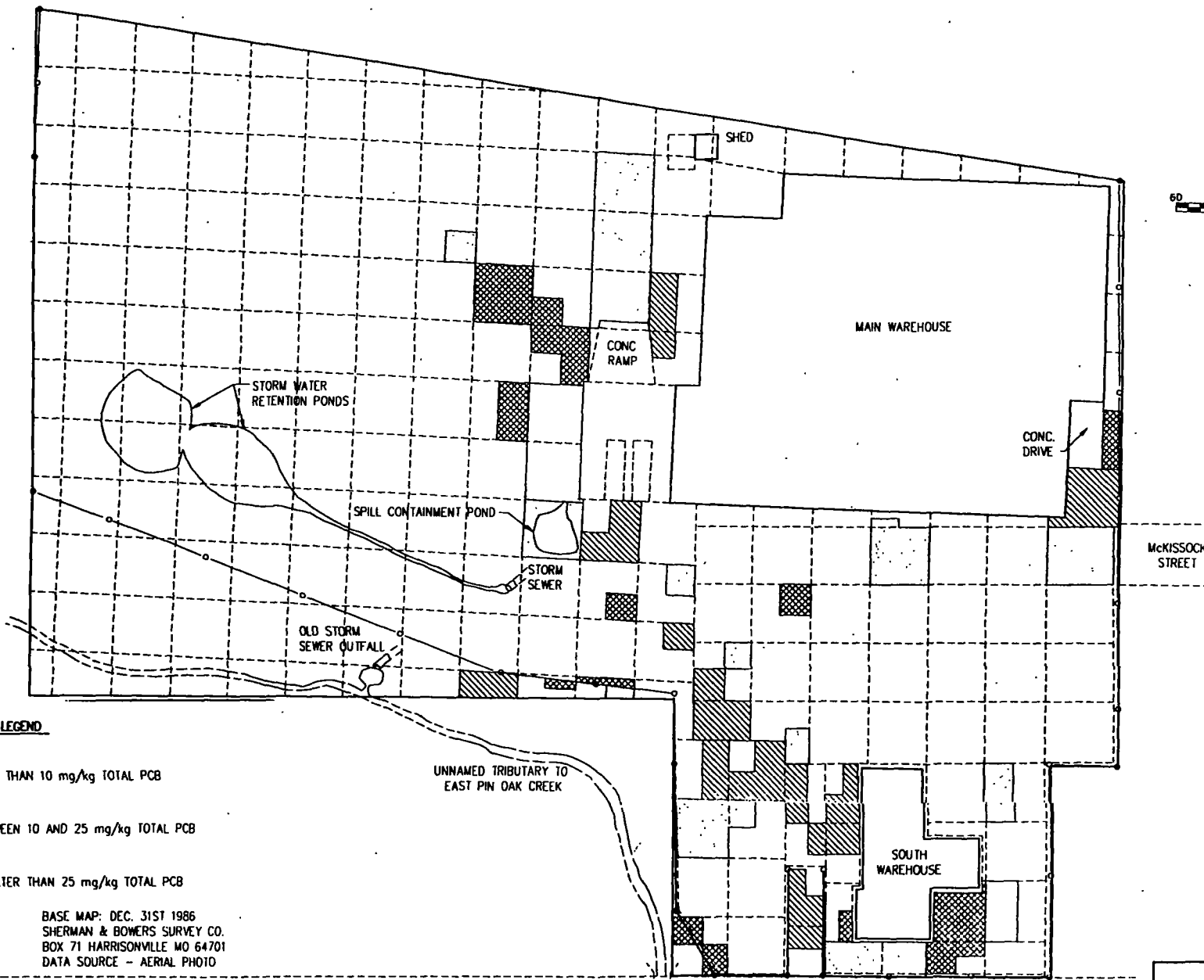
C. Endangerment Assessment (EA)

A meeting was held in Kansas City on March 23 to initiate the EA work. Attendees were Kwasnik and Walton, RI/FS Task Force; Robinson and Hollingsworth, Clean Sites; Tom Brown, David Langford, Steve Kidwell, and Mary Murphy, Burns & McDonnell; and Joyce Schlessinger and Frank Marrazza, Environ.




The group agreed to hold a data review meeting in Alexandria on April 10 at which time the first EA product, the "Exposure Pathway Issues" memo would be discussed.

III. SITE ACTIVITIES FOR APRIL

- o Analytical results will continue to be received and organized.
- o The EA contractor, Environ, will continue with the endangerment assessment work.
- o The Existing Data Validation memo will be completed and submitted to the EPA.
- o An overall schedule review will be completed in light of the additional sampling program currently underway.



LEGEND

-  LESS THAN 10 mg/kg TOTAL PCB
-  BETWEEN 10 AND 25 mg/kg TOTAL PCB
-  GREATER THAN 25 mg/kg TOTAL PCB

BASE MAP: DEC. 31ST 1986
 SHERMAN & BOWERS SURVEY CO.
 BOX 71 HARRISONVILLE MO 64701
 DATA SOURCE - AERIAL PHOTO

MO. STATE HWY. NO 58



60 0 60 120
 SCALE IN FEET

McKISSOCK STREET

MAIN WAREHOUSE

SHED

CONC RAMP

STORM WATER
RETENTION PONDS

SPILL CONTAINMENT POND

STORM
SEWER

OLD STORM
SEWER OUTFALL

UNNAMED TRIBUTARY TO
EAST PIN OAK CREEK

SOUTH
WAREHOUSE

→ JANUARY 1989
 GRAPHICAL SOIL
 SAMPLING RESULTS
 ROSE CHEMICAL SITE



CLEAN SITES INC

1199 NORTH FAIRFAX STREET / ALEXANDRIA VIRGINIA 22314 / 703-683-8522
TELECOPIER NO. 703-548-8773
MIDWEST REGIONAL OFFICE. 1400 E. TOUHY AVENUE / SUITE 215 / DES PLAINES, IL 60018 / 312-635-7580

May 17, 1989

Mr. Steven E. Kinser
Regional Project Manager
U.S.E.P.A.
Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101

SUBJECT: EPA SITE STATUS REPORT NO. 18
(AOC 87-F-0007)
ROSE CHEMICALS SITE

Dear Steve:

The EPA Site Status Report for the Rose Chemicals Site at Holden, Missouri, is attached. This report covers progress during April, 1989.

Very truly yours,

Robin J. Robinson
CSI Project Manager

RJR/sjr

Enclosures:

cc: Mr. George Hess
U.S.E.P.A.
Region VII
25 Funston Road
Kansas City, KS 66115

Bob Morby
U.S.E.P.A.
Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101

Mr. Jim Kohanek, Clean Sites, Inc.

PROJECT PROGRESS REPORT NO. 18
(AOC 87-F-0007)

ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR PERIOD APRIL 1ST THROUGH APRIL 30TH, 1989

HIGHLIGHTS

- o The Rose Technical Committee met April 10 and discussed latest sampling results along with the Endangerment Assessment.
- o Burns and McDonnell completed additional sampling and analysis, including second round of groundwater sampling, Mrs. Anderson's wells, sewer lines east and west of the building and property east of the site.
- o Burns and McDonnell developed the data package for site characterization for delivery to Environ.

PROGRESS REPORT NO. 18
(AOC 87-F-0007)

ROSE CHEMICALS SITE - HOLDEN, MISSOURI

STATUS FOR APRIL, 1989

I. REMOVAL ACTIVITIES - FOLLOWUP

The Modified Removal Work Plan was completed and submitted to EPA. Sheldon Zable is in discussions with EPA Attorney Scott Pemberton regarding EPA returned material.

II. RI/FS

A. Plan Development

The Subsurface Exploration Technical Memorandum was submitted on May 8. The Building and Structure Technical Memorandum is under development and will be submitted in mid-May. The Data Evaluation Technical Memorandum and SAP Revisions are to be submitted to the RI/FS Task Force in mid-May. Subsequently, they will be submitted to the EPA.

B. Site Activities

1. Monitoring Wells

The second round of groundwater sampling was completed. The majority of samples with detectable PCBs had less than 1 ppb. Some results reported are difficult to explain. In several sets of analytical results, the PCB concentration in the filtered sample is greater than its corresponding unfiltered sample. Burns and McDonnell is identifying possible reasons for these problems and will adjust sampling methods accordingly for the third round. It does not appear that laboratory error is a likely cause since the blanks show no detectable PCBs.

The third round of groundwater sampling is planned for the week of June 12.

The field portion of the slug testing has been completed. The calculations of hydraulic properties have not been completed. However, preliminary indications are as previously anticipated, that is the soils have a low permeability.

2. Creek Sediment Samples

The two wells (north and south) on Mrs. Anderson's property were purged, sampled and analyzed and found to contain non-detectable concentrations of PCBs (less than 0.5 ppb) or other contaminants.

3. Warehouse Core Samples

Efforts continue on determining the potential source of contamination of B-12, beneath the loading dock. Sampling around certain sewer lines near the building has eliminated several possible sources. However, other possible sources continue to be investigated. One is a storm water sewer which eventually drains to a spill containment pond. Another is a drainage pit in the Main Warehouse with a false bottom. Dye tests will be used to identify these potential sources.

Eventually, the contamination beneath B-12 needs to be delineated. However, the present effort is intended to identify the source.

C. Endangerment Assessment (EA)

The data package for site characterization was complete and sent to Environ on May 8. The EA is expected to be completed in eight weeks. The Exposure Pathway Issues memo was discussed at the April 10 RI/FS Task Group Meeting.

III. SITE ACTIVITIES FOR MAY

- o Environ will continue working on the EA.
- o Burns and McDonnell will submit the Data Evaluation Technical Memorandum and SAP Revisions to CSI and the RI/FS Task Group.
- o Burns and McDonnell, CSI and the RI/FS Task Force will determine next step of investigation on the B-12 warehouse core location and implement same.



CLEAN SITES INC

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June 16, 1989

Mr. Steven E. Kinser
Regional Project Manager
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Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101

SUBJECT: EPA SITE STATUS REPORT NO. 19
(AOC 87-F-0007)
ROSE CHEMICALS SITE

Dear Steve:

The EPA Site Status Report for the Rose Chemicals Site at Holden, Missouri, is attached. This report covers progress during May, 1989.

Very truly yours,

Robin J. Robinson
CSI Project Manager

RJR/sjr

Enclosures:

cc: Mr. George Hess
U.S.E.P.A.
Region VII
25 Funston Road
Kansas City, KS 66115

Bob Morby
U.S.E.P.A.
Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101

Mr. Jim Kohanek, Clean Sites, Inc.

PROGRESS REPORT NO. 19
(AOC 87-F-0007)

ROSE CHEMICALS SITE - HOLDEN, MISSOURI

STATUS FOR MAY, 1989

I. REMOVAL ACTIVITIES - FOLLOWUP

No resolution has yet been reached regarding the release of EPA returned materials.

II. RI/FS

A. Plan Development

The Building and Structure Technical Memorandum was reviewed by the RI/FS Task Force during May. Minor modifications are being made by Burns and McDonnell. The memorandum will be submitted to EPA during June.

The Subsurface Technical Memorandum was also reviewed by the RI/FS Task Force. More extensive comments and questions led to the need for a meeting which will be held in Holden on June 12.

The Data Validation Technical Memorandum has been drafted by Burns and McDonnell and submitted to the RI/FS Task Force for review. It will be submitted to the EPA by July.

B. Site Activities

1. Sampling and Analysis Plan Addendum

As a result of the additional sampling which was conducted at the site an addendum to the Sampling and Analysis Plan has been prepared. It will be submitted to EPA during June or early July. The addendum addresses additional soil sampling in the loading dock area where nine extra borings and a second test trench were

installed. A figure showing the location of these new sampling points in relationship to location B12 is attached as Figure II-1. The addendum also covers the offsite sampling on Mrs. Anderson's property, the additional surface soil samples taken from the private property directly east of the site and north of McKissock Street, the additional sediment samples obtained from East Pin Oak Creek at locations downstream of the sewage treatment outfall, additional biased concrete core samples in the warehouses, and additional sewer sample test pits. In addition, a revision to the monitoring well development plan has been included to address the use of a surge block to try to increase well recharging rates.

2. Monitoring Wells

Analytical results from the second round of groundwater sampling indicated low levels of PCBs (around 1 ppb) in most of the samples. In a number of cases, the PCB level in the filtered sample was higher than in the corresponding unfiltered sample indicating possible contamination during sampling. Elevated pH's have also been detected in the deep well samples.

C. Endangerment Assessment (EA)

Environ has begun to analyze the RI data and data from earlier analyses. It is too early to provide any results of their evaluation.

Environ is also preparing a memorandum identifying potentially significant exposure pathways for the site. They will attend the meeting on June 12 to discuss their work to date.

III.

SCHEDULE

- o The preparation of the RI report has been delayed as a result of the additional sampling required at the site and the more detailed endangerment assessment program which is being conducted by Environ. As a result, our current forecast for submission of the draft RI report to the EPA is August 25, roughly a three-month delay from our previous forecast. This slippage was informally communicated with Steve Kinser during May.
- o The current schedule for submitting the draft Feasibility Study to the EPA is early October, a two month slippage over our previous forecast. Adhering to this schedule will still allow the final FS, including a responsiveness summary, by late December, 1989.

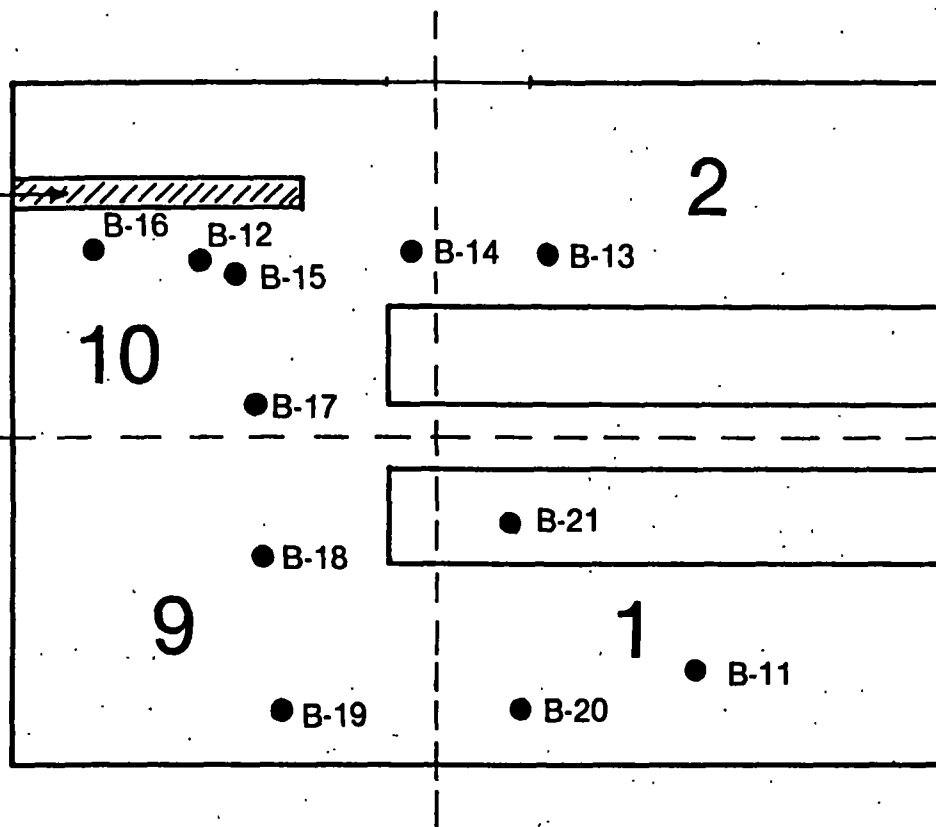
IV.

SITE ACTIVITIES FOR JUNE

- o A RI/FS Task Force meeting will be held in Holden on June 12.
- o The third round of groundwater sampling will be conducted using increased "clean room" measures to avoid the possibility of low level PCB contamination of the samples.



TT-2



LEGEND



Test trench location

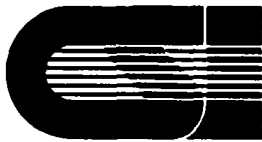


Boring location



EMPLOYEE - OWNED
Burns & McDonnell
ENGINEERS - ARCHITECTS - CONSULTANTS
HARTFORD CITY, MISSOURI

Figure II-1
SOIL BORING & TEST
TRENCH LOCATION PLAN,
LOADING DOCK-MAIN BUILDING



CLEAN SITES INC

1199 NORTH FAIRFAX STREET / ALEXANDRIA VIRGINIA 22314 / 703-683-8522
TELECOPIER NO. 703-548-8773

July 19, 1989

Mr. Steven E. Kinser
Regional Project Manager
U.S.E.P.A.
Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101

SUBJECT: EPA SITE STATUS REPORT NO. 20
(AOC 87-F-0007)
ROSE CHEMICALS SITE

Dear Steve:

The EPA Site Status Report for the Rose Chemicals Site at Holden, Missouri, is attached. This report covers progress during June, 1989.

Very truly yours,

Robin J. Robinson
CSI Project Manager

RJR/sjr

Enclosures:

cc: Mr. George Hess
U.S.E.P.A.
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25 Funston Road
Kansas City, KS 66115

Bob Morby
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Superfund Branch
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Kansas City, KS 66101

Mr. Jim Kohanek, Clean Sites, Inc.

PROJECT PROGRESS REPORT NO. 20
(AOC 87-F-0007)

ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR PERIOD JUNE 1ST THROUGH JUNE 30TH, 1989

HIGHLIGHTS

- o The third round of groundwater samples was completed. The analyses indicated no PCB contamination in most of the samples. The preliminary assessment is that the extra care taken during the sampling eliminated the problem which led to the low level PCB concentrations found in the second round.
- o Drafting continues on the Endangerment Assessment Report and the Remedial Investigation Report. The schedule still calls for delivering the draft report to EPA in August.

PROGRESS REPORT NO. 20
(AOC 87-F-0007)

ROSE CHEMICALS SITE - HOLDEN, MISSOURI

STATUS FOR JUNE, 1989

I. REMOVAL ACTIVITIES - FOLLOWUP

The EPA responded to the Steering Committee proposal for the removal of the EPA returned materials. Clean Sites has contacted Rollins, who is reviewing the letter from Scott Pemberton to Sheldon Zabel regarding future potential liability with respect to that equipment.

The EPA's comments on the Work Plan for decontaminating and removing that equipment have also been submitted to Rollins for their review.

Finally, the bankruptcy trustee has been requested to initiate release of the material to Rollins. Since there is a twenty day waiting period for that release to become effective, the current estimate is August 1 for Rollins to begin the removal of the material.

II. RI/FS

A. Plan Development

The Building and Structure Technical Memorandum was submitted to the RI/FS Task Force for final approval on July 6. The Subsurface Technical Memorandum was submitted to the Task Force on June 17. Addendum No. 1 to the Sampling and Analysis Plan is currently being reviewed by the Task Force. All three of these documents should be submitted to EPA before the end of July.

The Data Validation Technical Memorandum is being reviewed by the RI/FS Task Force. It will be submitted to the EPA during August.

B. Site Activities

1. Monitoring Wells

Based on the apparent sampling problem during the second round of groundwater sampling, a number of extra precautions were taken to ensure that no extraneous dust or foreign material got into the samples during the third round program. A tent was placed over each well and care was taken to ensure that the sample containers were not placed on the ground. These precautions made it more difficult for foreign material to be introduced during the sampling program.

Analytical results from the third round samples indicates PCBs in only 2 of 11 deep well samples. In wells 104 and 106, PCBs were detected in the following concentration range:

<u>Well</u>	<u>Conc(ppb)</u>	<u>Sample Type</u>
104	9.6	Unfiltered
106	6.3	Filtered (!)

These results indicate that the unexplained, low level PCB concentrations detected during the second round were, indeed, not coming from the groundwater itself. The result in well 106 is an obvious error, since the unfiltered sample showed BDL (below detection limit). The lab has been asked to double check the result.

C. Endangerment Assessment (EA)

Environ continues to analyze the RI data in the process of carrying out the Endangerment Assessment. The work continues on schedule toward issuing a draft of the EA to Burns and McDonnell on July 24.

Environ is also preparing a memorandum identifying potentially significant exposure pathways for the site. They attended the meeting on June 12 to discuss their work to date.

III. SCHEDULE

- o The overall schedule for delivery of the RI draft report remains late August, 1989 and the FS draft report is still scheduled for delivery to EPA mid-October, 1989.

IV. SITE ACTIVITIES FOR JULY

- o The RI/FS Draft Report will be completed by Burns and McDonnell and reviewed by the RI/FS Task Force and the Technical Subcommittee.
- o The Endangerment Assessment will be completed by Environ and submitted to Burns and McDonnell for review and incorporation into the RI Report.



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Resources for Responsible
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Chief Executive Officer
Cummins Engine Company

Roger Strelow
Vice President
General Electric Corporation

Hans A. Wolf
Vice Chairman
Syntex Corporation

August 16, 1989

Mr. Steven E. Kinser
Regional Project Manager
U.S.E.P.A.
Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101

SUBJECT: EPA SITE STATUS REPORT NO. 21
(AOC 87-F-0007)
ROSE CHEMICALS SITE

Dear Steve:

The EPA Site Status Report for the Rose Chemicals Site at Holden, Missouri, is attached. This report covers progress during July, 1989.

Very truly yours,



Robin J. Robinson
CSI Project Manager

RJR/sjr

Enclosures:

cc: Mr. George Hess
U.S.E.P.A.
Region VII
25 Funston Road
Kansas City, KS 66115

Bob Morby
U.S.E.P.A.
Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101

Mr. Jim Kohanek, Clean Sites, Inc.

PROJECT PROGRESS REPORT NO. 21
(AOC 87-F-0007)

ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR PERIOD JULY 1ST THROUGH JULY 31ST, 1989

HIGHLIGHTS

- o Drafts of the Remedial Investigation and Endangerment Assessment reports were reviewed by the RI/FS Task Force.

PROGRESS REPORT NO. 21
(AOC 87-F-0007)

ROSE CHEMICALS SITE - HOLDEN, MISSOURI

STATUS FOR JULY, 1989

I. REMOVAL ACTIVITIES - FOLLOWUP

The EPA, Clean Sites, and Rollins have now agreed on the final Work Plans for decontaminating and removing the EPA returned material. We are waiting on the Bankruptcy Trustee to release the material to Rollins so removal can begin. Early September is now forecast for the removal.

II. RI/FS

A. Plan Development

The Addendum No. 1 to the Sampling and Analysis Plan was formally submitted to EPA. The three technical memoranda will now be submitted as a part of the draft Remedial Investigation (RI) report. That report is scheduled for submission to U.S. EPA in late August, 1989.

The Table of Contents of the RI report is shown below. A meeting is scheduled in Kansas City for August 16-17 for the final review of the draft and for consolidation of Steering Committee comments before submission to EPA.

B. Site Activities

No site activities took place in July.

C. Endangerment Assessment (EA)

Environ has completed the draft Endangerment Assessment which will be Appendix B to the RI report.

III. SCHEDULE

- o The overall schedule for delivery of the RI Draft Report remains late August, 1989 and the FS Draft Report is still scheduled for delivery to EPA mid-October, 1989.

IV. SITE ACTIVITIES FOR AUGUST

- o The RI Draft Report will be submitted to U.S. EPA.
- o Work will continue on the FS Report.

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- F. ANALYTICAL LABORATORY REPORTS - EMS
- G. ANALYTICAL LABORATORY REPORTS - HAGER
- H. ANALYTICAL LABORATORY REPORTS - EPA REGION VII



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University of Washington

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Resources for Responsible
Management
Founding President
Clean Sites

Henry B. Schacht
Chief Executive Officer
Cummins Engine Company

Roger Strelow
Vice President
General Electric Corporation

Hans A. Wolf
Vice Chairman
Syntex Corporation

September 18, 1989

Mr. Steven E. Kinser
Regional Project Manager
U.S.E.P.A.
Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101

SUBJECT: EPA SITE STATUS REPORT NO. 22
(AOC 87-F-0007)
ROSE CHEMICALS SITE

Dear Steve:

The EPA Site Status Report for the Rose Chemicals Site at Holden, Missouri, is attached. This report covers progress during August, 1989.

Very truly yours,

Robin J. Robinson
CSI Project Manager

RJR/sjr

Enclosures:

cc: Mr. George Hess
U.S.E.P.A.
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25 Funston Road
Kansas City, KS 66115

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Kansas City, KS 66101

Mr. Jim Kohanek, Clean Sites, Inc.

PROJECT PROGRESS REPORT NO. 22
(AOC 87-F-0007)

ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR PERIOD AUGUST 1ST THROUGH AUGUST 31ST, 1989

HIGHLIGHTS

- o The draft of the Remedial Investigation Report was submitted to EPA on September 1, 1989.
- o The EPA-returned material was abandoned by the Bankruptcy Trustee, and Rollins was authorized to take possession and properly dispose of the material.

PROGRESS REPORT NO. 22
(AOC 87-F-0007)

ROSE CHEMICALS SITE - HOLDEN, MISSOURI

STATUS FOR AUGUST, 1989

I. REMOVAL ACTIVITIES - FOLLOWUP

The Bankruptcy Trustee submitted a motion to the U.S. Bankruptcy Court for the Western District of Missouri to abandon the EPA returned material at the site. On August 31, 1989, the Bankruptcy Judge, Frank W. Coger, granted the motion and ordered that the Trustees' motion to abandon all of the remaining real and personal property be sustained. The judge further ordered that Rollins Environmental Services (FS) Inc. is authorized to take possession of and properly handle or dispose of all the named property. This was the last legal hurdle to the removal of that material by Rollins. We anticipate that the material will be removed to Rollins' Tipton, Missouri facility during the month of September.

II. RI/FS

Members of the RI/FS Task Force met at Burns and McDonnell's office in Kansas City on August 16 and 17 for final editing of the RI Report. The Report was submitted to U.S. EPA (3 copies) on September 1, 1989. The report consists of the main report plus Appendices A-H which provide supporting information. The Endangerment Assessment, Existing Data Validation, Subsurface Exploration, Building and Structures Investigation, and Analytical Laboratory Reports are in the Appendices. Once the EPA has reviewed the draft report, Clean Sites and members of the RI/FS Task Force propose to meet with EPA and their contractor to receive comments and feedback.

III. SCHEDULE

- o The Draft Feasibility Study (FS) Report is scheduled for delivery to EPA in late October, 1989. A meeting of the Rose Chemicals Technical Committee is tentatively scheduled for October 19 to review the Draft Report.

IV. SITE ACTIVITIES FOR SEPTEMBER

- o Work will continue on the FS Report. No physical activity on the site is planned.



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Vermont Law School
Former Administrator
EPA 1977-81

Archibald Cox
Professor Emeritus
Harvard Law School

Louis Fernandez
President
Celgene Corporation
Former Chairman
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Vice Chairman
Syntex Corporation

October 16, 1989

Mr. Steven E. Kinser
Regional Project Manager
U.S.E.P.A.
Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101

SUBJECT: EPA SITE STATUS REPORT NO. 23
(AOC 87-F-0007)
ROSE CHEMICALS SITE

Dear Steve:

The EPA Site Status Report for the Rose Chemicals Site at Holden, Missouri, is attached. This report covers progress during September, 1989.

Very truly yours,

Robin J. Robinson
CSI Project Manager

RJR/sjr

Enclosures:

cc: ✓ Mr. George Hess
U.S.E.P.A.
Region VII
25 Funston Road
Kansas City, KS 66115

Bob Morby
U.S.E.P.A.
Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101

Mr. Jim Kohanek, Clean Sites, Inc.

PROJECT PROGRESS REPORT NO. 23
(AOC 87-F-0007)

ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR PERIOD SEPTEMBER 1ST THROUGH SEPTEMBER 30TH, 1989

HIGHLIGHTS

- o Work continued on the draft Feasibility Study which is scheduled for submission to EPA in late October 1989.
- o Rollins continued to inventory the EPA-returned material which was abandoned by the Bankruptcy Trustee to Rollins in August.

PROGRESS REPORT NO. 23
(AOC 87-F-0007)

ROSE CHEMICALS SITE - HOLDEN, MISSOURI

STATUS FOR SEPTEMBER, 1989

I. REMOVAL ACTIVITIES - FOLLOWUP

Rollins brought several potential buyers to the site to inspect the EPA-returned material which has now been turned over to Rollins. We still do not have a firm schedule for the cleanup and removal of that material.

II. RI/FS

Burns & McDonnell continued the drafting of the Feasibility Study (FS) Report. Based on the input received in the August 16 and 17 meeting in Kansas City, the report will include eight alternatives for the remediation of the site. Once a clean draft of the FS report has been prepared, it will be reviewed by the Rose Technical Subcommittee and subsequently the Steering Committee in a meeting in Atlanta on October 19 and 20. Following that review and approval, the report will be submitted to the EPA.

III. SCHEDULE

The draft FS report is scheduled for delivery to EPA in late October 1989.

IV. SITE ACTIVITIES FOR OCTOBER

Work will continue on the FS Report. No physical activity on the site is planned.



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November 15, 1989

Mr. Steven E. Kinser
Regional Project Manager
U.S.E.P.A.
Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101

**SUBJECT: EPA SITE STATUS REPORT NO. 24
(AOC 87-F-0007)
ROSE CHEMICALS SITE**

Dear Steve:

The EPA Site status Report for the Rose Chemicals Site at Holden, Missouri, is attached. This reports covers progress during October, 1989.

Very truly yours,



Robin J. Robinson
CSI Project Manager

RJR/sjr

Enclosures

cc: Mr. George Hess
U.S.E.P.A.
Region VII
25 Funston Road
Kansas City, KS 66115

Bob Morby
U.S.E.P.A.
Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101

Mr. Jim Kohanek, Clean Sites, Inc.

PROJECT PROGRESS REPORT NO. 24
(AOC 87-F-0007)

ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR PERIOD OCTOBER 1ST THROUGH OCTOBER 31ST, 1989

HIGHLIGHTS

- o Work continued on the draft Feasibility Study. The Steering Committee reviewed the draft report in Atlanta and suggested modifications. The FS is scheduled now for delivery to EPA in November, 1989.
- o Rollins continued to inventory the EPA-returned material which was abandoned by the Bankruptcy Trustee to Rollins in August.

PROGRESS REPORT NO. 24
(AOC 87-F-0007)

ROSE CHEMICALS SITE - HOLDEN, MISSOURI

STATUS FOR OCTOBER, 1989

I. REMOVAL ACTIVITIES - FOLLOWUP

- o Rollins named their project manager and was scheduled to begin their inventory of the EPA-returned material on November 6, 1989. The start of the physical removal is now scheduled for the fourth week in November and should take about one week.

II. RI/FS

- o Burns and McDonnell completed the first draft of the Feasibility Study (FS) Report. The Technical and Legal Subcommittees and the Steering Committee met in Atlanta on October 19 and 20 to review the draft. A number of changes were suggested and Burns & McDonnell continued revising the report through the end of the month. A final draft will be submitted to the Rose Steering Committee during the week of November 20.

EPA continued to review the draft Remedial Investigation (RI) Report during October.

III. SCHEDULE

- o The draft FS Report is scheduled for delivery to EPA in late November, 1989.
- o EPA's comments on the RI Report will be received and reviewed in November prior to a December 1 meeting to discuss the report.

IV. SITE ACTIVITIES FOR NOVEMBER

Rollins will begin the removal of the EPA-returned materials from the site.



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December 15, 1989

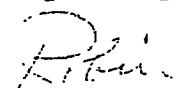
Mr. Steven E. Kinser
Regional Project Manager
U.S.E.P.A.
Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101

SUBJECT: EPA SITE STATUS REPORT NO. 25
(AOC 87-F-0007)
ROSE CHEMICALS SITE

Dear Steve:

The EPA Site status Report for the Rose Chemicals Site at Holden, Missouri, is attached. This reports covers progress during November, 1989.

Very truly yours,


Robin J. Robinson
CSI Project Manager

RJR/sjr

Enclosures

cc: Mr. George Hess
U.S.E.P.A.
Region VII
25 Funston Road
Kansas City, KS 66115

Bob Morby
U.S.E.P.A.
Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101

Mr. Jim Kohanek, Clean Sites, Inc.

**PROJECT PROGRESS REPORT NO. 25
(AOC 87-F-0007)**

ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR PERIOD NOVEMBER 1ST THROUGH NOVEMBER 30TH, 1989

HIGHLIGHTS

- o EPA provided response comments to the Draft Remedial Investigation which was submitted on September 1, 1989.
- o Final revisions to the Draft Feasibility Study were given second priority to work on the RI Comments. The FS should be delivered to EPA in December, 1989.
- o Removal of the EPA-returned material began on November 6, 1989. At the end of November, four loads had been shipped to Tipton, Missouri. The remaining material should be removed by Christmas.

PROGRESS REPORT NO. 25
(AOC 87-F-0007)

ROSE CHEMICALS SITE - HOLDEN, MISSOURI

STATUS FOR NOVEMBER, 1989

I. REMOVAL ACTIVITIES - FOLLOWUP

- o The removal of the EPA-returned material began on November 6, 1989. The material is being vacuumed to remove dust and then shipped in enclosed vans to Rollins' Tipton, Missouri facility for decontamination. Because of the difficulty in completely wrapping the flatbed trailers, a modification to the Work Plan was approved by EPA. This modification allowed us to wrap only the top part of the trailer and to wash the tires and undercarriage before transporting them to Tipton. At the end of the month, approximately four loads had been shipped to Tipton and 12 or 13 loads remain at the Rose Site.

We anticipate that all the material will be removed before Christmas.

II. RI/FS

- o Comments were received from EPA regarding the Draft Remedial Investigation Report which had been submitted on September 1, 1989. The two main areas of concern to the EPA were:
 - 1. The hydrogeological picture of the site, as developed by Burns and McDonnell, appeared to differ in some respects from that of the EPA's consultant.
 - 2. A number of sample results had been dismissed by Burns and McDonnell for a variety of reasons without sufficient supporting evidence.

These points, and a number of smaller details, were discussed in a meeting at the EPA's office on December 6, 1989. The results of this meeting will be reported in the December Progress Report.

- o Burns and McDonnell continued to work on final revisions to the Feasibility Study. This work, however, has been assigned a lower priority than preparing the responses to the EPA's comments on the RI document.

III. SCHEDULE

- o The draft FS Report is scheduled for delivery to EPA in late December, 1989.
- o EPA's comments on the Remedial Investigation Draft were discussed in a meeting on December 6, 1989. The Remedial Investigation will be modified during December to reflect comments received.

IV. SITE ACTIVITIES FOR DECEMBER

- o Rollins will complete the removal of the EPA-returned materials from the site. Upon completion of the removal, the guard service at the site will be terminated.



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January 16, 1990

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Chairman
Monsie Corporation

Mr. Steven E. Kinser
Regional Project Manager
U.S.E.P.A.
Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101

SUBJECT: EPA SITE STATUS REPORT NO. 26
(AOC 87-F-0007)
ROSE CHEMICALS SITE

Dear Steve:

The EPA Site status Report for the Rose Chemicals Site at Holden, Missouri, is attached. This reports covers progress during December, 1989.

Very truly yours,

Robin J. Robinson
CSI Project Manager

RJR/sjr

Enclosures

cc: Mr. George Hess
U.S.E.P.A.
Region VII
25 Funston Road
Kansas City, KS 66115

Bob Morby
U.S.E.P.A.
Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101

Mr. Jim Kohanek, Clean Sites, Inc.

PROJECT PROGRESS REPORT NO. 26
(AOC 87-F-0007)

ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR PERIOD DECEMBER 1ST THROUGH DECEMBER 31ST, 1989

HIGHLIGHTS

- o A meeting was held with EPA on December 6, 1989 to discuss comments regarding the draft Remedial Investigation report which was submitted on September 1, 1989. The report is being modified based on the results of that meeting.
- o The Feasibility Study draft was almost completed. A meeting of the RI/FS Task Force was held in Alexandria on December 21, 1989 to discuss that work product. The draft will be submitted to EPA in January, 1990.
- o Removal of the EPA returned material continued. The removal was hampered by cold weather and unexpected problems. It should be completed in January, 1990.

PROGRESS REPORT NO. 26
(AOC 87-F-0007)

ROSE CHEMICALS SITE - HOLDEN, MISSOURI

STATUS FOR DECEMBER, 1989

I. REMOVAL ACTIVITIES - FOLLOWUP

- o The removal of the EPA returned material continued in December. All but four loads of the material had been shipped to Rollins' facility in Tipton, Missouri by the end of the month. The final shipments will take place in January, 1990. The boat was stripped and decontaminated at the site, found to be clean, and sold to a local resident.
- o As an item of interest, we are informed that a buyer has been found for the Bentley. The Bentley will be shipped to Tipton with the rest of the material for decontamination.

II. RI/FS

- o The comments from the EPA regarding the draft Remedial Investigation report were reviewed by Clean Sites, Burns and McDonnell, and members of the RI/FS Task Force. A meeting was held on December 6, 1989 to discuss the EPA's comments and our response. The meeting was productive and the RI report is being revised to reflect items agreed upon in that meeting.
- o A key point in the meeting was the discussion of the need of a fourth round of groundwater sampling. The parties agreed that this would be an appropriate addition to the RI/FS program and details of the fourth round groundwater sampling program are being developed. We expect the sampling to take place in late January or early February, 1990.

- o The draft Feasibility Study (FS) report was reviewed and revised. The FS report was discussed at a meeting of the RI/FS Task Force in Alexandria on December 21, 1989. With the necessary recycle, it is expected that the draft will be submitted to the EPA in the last half of January, 1990.

III. SCHEDULE

- o The draft FS report will be delivered to EPA in late January, 1990.
- o The final RI report is scheduled for delivery to EPA in late January or early February, 1990.

IV. SITE ACTIVITIES FOR JANUARY

- o Rollins will complete the removal of the EPA returned material from the site. After removal has been completed, the guard service at the site will be terminated. The expected date for terminating the guard service is February 1, 1990.
- o Upon approval by EPA, the fourth round of groundwater sampling will begin in late January, 1990.

ROSE CHEMICALS STEERING COMMITTEE

Steering Committee Member Organizations

February 9, 1990

Central Illinois
Public Service Company

Central Louisiana
Electric Company

Colorado Springs Dept.
of Utilities

Commonwealth Edison
Company

General Motors Corp.

Illinois Power Company

Iowa Public
Service Company

Interstate Power Company

Kansas Power &
Light Company

Louisiana Power & Light
Company/New Orleans
Public Service Inc.

Missouri Public Service

National Rural Electric
Cooperative Assn.

New England Power
Service Company

Oklahoma Gas and
Electric Company

Omaha Public Power
District

Southwestern Electric
Power Company

West Texas Utilities Company

Western Area Power
Administration

Dear Concerned Citizen,

I'm writing to update you on activities to clean up the Martha C. Rose Chemicals site in Holden.

As you know, with the oversight of the Environmental Protection Agency (EPA), the Rose Chemicals Steering Committee more than a year ago removed 19 million pounds of materials contaminated with polychlorinated biphenyls (PCBs).

Since then, the Rose Chemicals Steering Committee has been conducting technical studies to determine the extent of the remaining contamination and to evaluate alternatives to complete the cleanup.

Under EPA's Superfund program, two technical studies are conducted in determining a remedy. First, a remedial investigation, known as an "RI", looks for contamination and potential pathways of exposure to people or resources. This is done by sampling soil, air, buildings and water at the site. The next step is a feasibility study. Also referred to as an "FS," this study evaluates alternative cleanup actions to protect health and the environment and meet other statutory criteria and evaluates cost.

EPA reviews, comments on and approves these documents, and, after public comment, uses them as the basis for selecting a remedy. EPA then outlines the remedy it has selected and seeks public comment on that selection.

The Rose Chemicals Steering Committee submitted a draft of the RI for the Rose facility to EPA's Region VII Office in Kansas City, Kan., September 1, 1989. EPA's comments now are being added to the document. A draft feasibility study was submitted to EPA for review January 17, 1990.

ROSE CHEMICALS SITE STEERING COMMITTEE
500 SOUTH 27TH STREET
DECATUR, ILLINOIS 62525
(217)424-6837

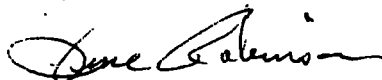
Both documents are expected to be available to the public in February or March 1990. Notice of their availability will be published in the newspapers, and, as required by law, EPA will provide a three-week public comment period on the studies' results, as well as on the cleanup action EPA selects as its "preferred alternative." There also will be a public meeting on the documents.

EPA then is expected to select a final remedy by mid-1990, and the cleanup work at the site is expected to begin in late 1990 or in early 1991.

I'm pleased that the cleanup process at the Rose site is progressing, and especially pleased that more than 99 percent of the contamination and problem there has already been addressed. Most recently, the very last of the remaining equipment, such as old trucks and machines, have been removed from the site.

If you have any questions about this process or its timing, don't hesitate to call Robin Robinson or Joan Ebzery at Clean Sites, which has managed the cleanup and is managing the studies. Their number is (703) 683-8522. Or call Steve Wurtz or Steve Kinser at EPA's Region VII office. Mr. Wurtz, at (913) 236-2803, is a community relations specialist, and Mr. Kinser, at (913) 236-2856, is EPA's project manager for the Rose site.

Sincerely,



Jene Robinson,
Chair,
Rose Chemicals
Steering Committee



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February 16, 1990

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Chairman
Mentex Corporation

Mr. Steven E. Kinser
Regional Project Manager
U.S.E.P.A.
Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101

SUBJECT: EPA SITE STATUS REPORT NO. 27
(AOC 87-F-0007)
ROSE CHEMICALS SITE

Dear Steve:

The EPA Site status Report for the Rose Chemicals Site at Holden, Missouri, is attached. This reports covers progress during January, 1990.

Very truly yours,

Robin J. Robinson
CSI Project Manager

RJR/sjr

Enclosures

cc: Mr. George Hess
U.S.E.P.A.
Region VII
25 Funston Road
Kansas City, KS 66115

Bob Morby
U.S.E.P.A.
Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101

Mr. Jim Kohanek, Clean Sites, Inc.

PROJECT PROGRESS REPORT NO. 27
(AOC 87-F-0007)

ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR PERIOD JANUARY 1ST THROUGH JANUARY 31ST, 1990

HIGHLIGHTS

- o The Draft Feasibility Study was completed and submitted to the EPA on January 17, 1990. EPA is currently reviewing that document.
- o The Remedial Investigation Report was revised by Burns and McDonnell and submitted to the RI/FS Task Force for final review. The document will be returned to EPA early in February.
- o A fourth round of groundwater sampling, agreed to by EPA and the Technical Committee, began on January 29. Sampling should be completed around February 9.
- o Removal of the EPA returned material was completed on January 17, 1990. Steve Kinser inspected the site on January 18, 1990. The guard service will be terminated at the site as soon as the groundwater sampling program is finished.

PROGRESS REPORT NO. 27
(AOC 87-F-0007)

ROSE CHEMICALS SITE - HOLDEN, MISSOURI

STATUS FOR JANUARY, 1990

I. REMOVAL ACTIVITIES - FOLLOWUP

- o All of the EPA returned material has now been removed from the site by Rollins Environmental Services. The material was shipped to Rollins' Tipton, Missouri facility where it has been decontaminated for their further use. Steve Kinser inspected the site on January 18, 1990.
- o The site now has no remaining materials on it. Consequently, the EPA has agreed that the guard service can be terminated. That will take place around February 9, 1990 at the time groundwater sampling program is finished, see below.

II. RI/FS

- o The Draft Feasibility Study was completed and submitted to the EPA on January 17, 1990. That report is currently being studied by the EPA who will be providing feedback to the RI/FS Task Force in due course.
- o The revisions to the RI Draft, based on comments provided in the meeting with EPA on December 6, 1989, continued through January. Burns and McDonnell finished their work on January 29, 1990 and submitted the revised draft to members of the RI/FS Task Force for final review. The document should be re-submitted to the EPA during the week of February 5.
- o A fourth round of groundwater sampling was agreed to in the meeting on December 6, 1989. Burns and McDonnell prepared a Work Plan which was reviewed by the EPA during January and approved on January 29, 1990. Sampling started at the site on that same date with observers from Clean Sites, Black and Veatch representing EPA, and Harry Walton representing the RI/FS Task Force. This sampling program is being conducted with extreme care. The results, which will not be available for several weeks, should provide final confirmation of the state of the groundwater at the Rose Site.

III. SCHEDULE

- o The final RI Report is scheduled for delivery to EPA in early February, 1990.
- o The Draft FS Report will be reviewed by EPA and modified as appropriate in February, 1990.

IV. SITE ACTIVITIES FOR FEBRUARY

- o The groundwater sampling program will be completed in early February.
- o No further site activities are anticipated until the final remedial action has been agreed upon and initiated. Consequently, the guard service will be stopped in February.



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March 16, 1990

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Syntex Corporation

SUBJECT: EPA SITE STATUS REPORT NO. 28
(AOC 87-F-0007)
ROSE CHEMICALS SITE

Dear Steve:

The EPA Site status Report for the Rose Chemicals Site at Holden, Missouri, is attached. This reports covers progress during March, 1990.

Very truly yours,

Robin J. Robinson
CSI Project Manager

RJR/sjr

Enclosures

cc: Mr. George Hess
U.S.E.P.A.
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Kansas City, KS 66115

Bob Morby
U.S.E.P.A.
Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101

Mr. Jim Kohanek, Clean Sites, Inc.

PROJECT PROGRESS REPORT NO. 28
(AOC 87-F-0007)

ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR PERIOD FEBRUARY 1ST THROUGH FEBRUARY 28TH, 1990

HIGHLIGHTS

- o The revised Remedial Investigation Report was completed by Burns & McDonnell, reviewed by the RI/FS Task Force, and submitted to the EPA on February 26, 1990.
- o EPA and Missouri DNR submitted written comments on the Draft Feasibility Study in early March, 1990. Those comments are currently being incorporated in the report.
- o The fourth round of groundwater sampling was completed on February 9, 1990. Results substantiated the third round results. None of the deep wells showed any contamination at above detection limits. Only four shallow wells, which have consistently shown VOCs, had detectable VOC concentrations. Only one shallow well showed detectable PCB concentrations (5.8 ug/l).

PROGRESS REPORT NO. 28
(AOC 87-F-0007)

ROSE CHEMICALS SITE - HOLDEN, MISSOURI

STATUS FOR FEBRUARY, 1990

I. RI/FS

- o The revised Remedial Investigation report (RI), completed by Burns and McDonnell on January 29, 1990, was reviewed by the RI/FS Task Force during early February, 1990. The document was resubmitted to the EPA on February 26, 1990.
- o A Feasibility Study (FS) meeting was held in EPA's office in Kansas City, Missouri on February 8, 1990. In that meeting, we received preliminary feedback from Steve Kinser regarding the Draft FS. The formal comments from EPA and MDNR were received on March 1 and 2, 1990. The comments addressed three primary issues: (1) the "preference for treatment" stressed in the new National Contingency Plan, (2) the possible contamination of shallow groundwater, and (3) the appropriate risk level to use in selecting possible remedies. Based on those comments, a number of revisions will be required in the FS.
- o The fourth round of groundwater sampling began on January 29, 1990 and was completed on February 9, 1990. The sampling program was conducted with extreme care to ensure that no cross contamination of the samples occurred. Analytical results were not complete until early March. They indicated that none of the deep monitoring wells at the site, the 100 series, had any contamination of any kind. The results also indicated that in the shallow monitoring wells, only MW-207 tested positive for PCBs. It showed 5.8 ug/l which is consistent with previous results from that well. Several of the shallow wells had volatile organic readings as they had in the past. These results will be submitted to EPA as an addendum to the RI. In general, the results appeared to confirm the third round of sampling, thus substantiating Burns & McDonnell's position that some of the samples in the first two rounds had picked up minute quantities of dust or some other foreign substance.

- o On February 9, 1990 when the sampling program was completed at the site, the 24-hour guard service was terminated. The site will remain secure but no further site activities are planned until final remediation begins. All appropriate officials in the Holden community have been notified.

II. SCHEDULE

- o The FS Report will be revised during March based on comments by MDNR and EPA. The revised Draft will be submitted to EPA in late March or early April.

III. SITE ACTIVITIES FOR MARCH

- o No site activities are planned.



CLEAN SITES

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April 13, 1990

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Syntex Corporation

**SUBJECT: EPA SITE STATUS REPORT NO. 29
(AOC 87-F-0007)
ROSE CHEMICALS SITE**

Dear Steve:

The EPA Site status Report for the Rose Chemicals Site at Holden, Missouri, is attached. This reports covers progress during March, 1990.

Very truly yours,

Robin J. Robinson
CSI Project Manager

RJR/sjr

Enclosures

cc: Mr. George Hess
U.S.E.P.A.
Region VII
25 Funston Road
Kansas City, KS 66115

Bob Morby
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Mr. Jim Kohanek, Clean Sites, Inc.

PROJECT PROGRESS REPORT NO. 29
(AOC 87-F-0007)

ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR PERIOD MARCH 1ST THROUGH MARCH 31ST, 1990

HIGHLIGHTS

- o The draft Feasibility Study is being revised based on comments received from Steve Kinser on March 20, 1990.
- o The fourth round of groundwater samples did not detect PCBs in most samples, thus confirming the results of the third round.
- o The allowable holding time for some of the shallow well samples was exceeded in the fourth round. Therefore, those wells will be resampled in April at the lab's expense.

PROGRESS REPORT NO. 29
(AOC 87-F-0007)

ROSE CHEMICALS SITE - HOLDEN, MISSOURI

STATUS FOR MARCH, 1990

I. RI/FS

- o As pointed out last month, we received formal comments from EPA and MDNR on the Feasibility Study (FS) on March 1 and 2, 1990. After reviewing those comments, Joe Kwasnik and Robin Robinson met Steve Kinser on March 20 to discuss the issues raised. The meeting was beneficial in clarifying several issues. One significant EPA item is that the excess cancer risk at the site after remediation should be one in one million. It will be important in revising the FS to demonstrate that that risk level will be met or to explain clearly why achieving such a level is infeasible.

We also discussed the proper use of EPA's spill cleanup policy for PCBs in establishing site Applicable or Relevant and Appropriate Requirements (ARARs). We agreed that the spill cleanup policy, while not strictly an ARAR, is to be considered (TDC) in selecting the cleanup level for site soils.

The third issue discussed was volatile organic compounds (VOCs) at the site. We feel confident that our studies demonstrate the lack of a problem with VOCs at the site and are revising the FS to make that point clear.

- o Analytical results from the fourth round of groundwater sampling are now complete. These results confirm the results in the third round for both the shallow and the deep wells. The very low PCB concentrations found in rounds one and two were not present, thus substantiating the belief that the early samples picked up tiny dust particles.

Unfortunately, the laboratory, EMS, exceeded the allowable holding times for extraction of PCBs in the shallow well samples. While it is highly unlikely that the analytical results were compromised, the RI/FS Task Force decided to ask Burns & McDonnell to resample the shallow wells. That resampling will take place in mid-April. All expenses for sampling and analyses will be paid by EMS. There will be no charge of any kind to the Rose Project.

II. SCHEDULE

- o Burns & McDonnell will continue to revise the FS Report during April. The revised draft will be submitted to EPA toward the end of April.

III. SITE ACTIVITIES FOR APRIL

- o Burns & McDonnell will resample the shallow wells. This sampling program is expected to take two or three days.



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May 16, 1990

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Vice President
General Electric Corporation

A. Wolf
Chairman
Syntex Corporation

SUBJECT: EPA SITE STATUS REPORT NO. 30
(AOC 87-F-0007)
ROSE CHEMICALS SITE

Dear Steve:

The EPA Site status Report for the Rose Chemicals Site at Holden, Missouri, is attached. This report covers progress during April, 1990.

Very truly yours,

Robin J. Robinson
CSI Project Manager

RJR/sjr

Enclosures

cc: Mr. George Hess
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Bob Morby
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Mr. Jim Kohanek, Clean Sites, Inc.

PROJECT PROGRESS REPORT NO. 30
(AOC 87-F-0007)

ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR PERIOD APRIL 1ST THROUGH APRIL 30TH, 1990

HIGHLIGHTS

- o The resampling of round 4 shallow wells was completed. The analytical results indicated concentrations below detection limit at all wells, thus substantiating the results previously obtained.
- o The Feasibility Study (FS) revisions continued during April. A revised FS Report will be submitted to EPA during May.

PROGRESS REPORT NO. 30
(AOC 87-F-0007)

ROSE CHEMICALS SITE - HOLDEN, MISSOURI

STATUS FOR APRIL, 1990

I. RI/FS

- o Burns & McDonnell continued work on the revisions to the Feasibility Study (FS) Report during April. The necessary revisions required more time than anticipated and Burns & McDonnell had not finished the revisions by the end of the month. We anticipate receiving their final draft in early May.
- o Repeat sampling of the shallow wells was completed in early April. As reported last month, the resampling was required since EMS, the analytical laboratory, exceeded the allowable holding times for extraction of PCBs in the shallow well samples. All the shallow wells were resampled and reanalyzed. The analyses indicated below detection limit (BDL) readings in all wells for both semi-volatiles and PCBs. Thus, the resample confirms the previous analytical results for the fourth round.

The resample gave BDL readings even on well 207, which had previously shown low concentrations of PCBs. While no definitive conclusion can be drawn from this single measurement, it could indicate that the well contained only a small quantity of PCBs which may be dissipating with time.

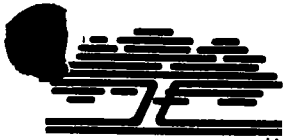
In the resampling program, shallow well 204 (to the west of the South Warehouse), was also resampled for total volatile organic compounds (VOCs). Total VOC readings were about 200 ppb. The VOC concentration measured in that well in round 4, was approximately 49 ppb. This well had shown high VOC concentrations in rounds 1, 2, and 3 (in the range of 10,000 ppb). Again, one cannot draw firm conclusions from this observation, but it could indicate that the quantity of organic compounds in the vicinity of that well is not large.

II. SCHEDULE

- o Burns & McDonnell will complete the revision of the FS Report during May. The revised draft will be recycled among key members of the RI/FS Task Force prior to submission to EPA before the end of May.

III. SITE ACTIVITIES FOR MAY

- o None expected.



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June 18, 1990

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SUBJECT: EPA SITE STATUS REPORT NO. 31
(AOC 87-F-0007)
ROSE CHEMICALS SITE

Dear Steve:

The EPA Site status Report for the Rose Chemicals Site at Holden, Missouri, is attached. This reports covers progress during May, 1990.

Very truly yours,

Robin J. Robinson
CSI Project Manager

RJR/sjr

Enclosures

cc: Mr. George Hess
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Kansas City, KS 66101

Mr. Jim Kohanek, Clean Sites, Inc.

PROJECT PROGRESS REPORT NO. 31
(AOC 87-F-0007)

ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR PERIOD MAY 1ST THROUGH MAY 31ST, 1990

HIGHLIGHTS

- o The feasibility study (FS) revisions continued through May. Burns & McDonnell completed an extensive redrafting of the document incorporating EPA and RI/FS Task Force comments.

PROGRESS REPORT NO. 31
(AOC 87-F-0007)

ROSE CHEMICALS SITE - HOLDEN, MISSOURI

STATUS FOR MAY 1 - 31, 1990

I. RI/FS

Based on the comments from EPA, Burns & McDonnell carried out an extensive revision to the Feasibility Study during May. That revision expanded the technology options which are to be considered for the various cleanup alternatives. The revised document also addressed in greater detail several additional exposure pathways. Burns & McDonnell completed the revised document at the end of the month and submitted it to members of the RI/FS Task Force for their review.

The final Task Force review will take place in early June following which the final draft will be submitted to EPA.

II. SCHEDULE

- o The revised draft of the FS will be submitted to EPA during June.

III. SITE ACTIVITIES FOR JUNE

- o None expected.



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July 16, 1990

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Thomas A. Wolf
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Intertek Corporation

SUBJECT: EPA SITE STATUS REPORT NO. 32
(AOC 87-F-0007)
ROSE CHEMICALS SITE

Dear Steve:

The EPA Site status Report for the Rose Chemicals Site at Holden, Missouri, is attached. This reports covers progress during June, 1990.

Very truly yours,

Robin J. Robinson
CSI Project Manager

RJR/sjr

Enclosures

cc: Mr. George Hess
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Mr. Jim Kohanek, Clean Sites, Inc.

PROJECT PROGRESS REPORT NO. 32
(AOC 87-F-0007)

ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR PERIOD JUNE 1ST THROUGH JUNE 30TH, 1990

HIGHLIGHTS

- o The Feasibility Study (FS) was completed during June. The document was submitted to the EPA on June 29, 1990.

PROGRESS REPORT NO. 32
(AOC 87-F-0007)

ROSE CHEMICALS SITE - HOLDEN, MISSOURI

STATUS FOR JUNE, 1990

I. RI/FS

- o Burns and McDonnell completed the revisions to the Feasibility Study during June, 1990. The revised document was reviewed by Joe Kwasnik, Harry Walton, Sheldon Zabel and Robin Robinson. After final modification, the document was submitted to U.S. EPA on June 29, 1990.
- o Burns and McDonnell prepared an attachment to the FS which summarizes the responses to the EPA comments on the draft FS. This was provided to make it easy for EPA to spot the changes which were made.

II. SCHEDULE

- o The remaining schedule for issuing the RI and the FS is with the EPA. We anticipate that an early release will be made. Following that, a public meeting will be held to explain the FS options and receive initial comments. Then EPA will prepare the Proposed Plan and schedule a second public meeting to receive formal comments. Finally, EPA will prepare a Responsiveness Summary which will respond to all comments received and then issue the Record of Decision.
- o On a parallel track, the negotiating committee headed by Jay Pruett will be negotiating the Consent Decree for the final cleanup with EPA.

III. SITE ACTIVITIES FOR JULY

- o None expected.



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August 16, 1990

Mr. Steven E. Kinser
Regional Project Manager
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Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101

**SUBJECT: EPA SITE STATUS REPORT NO. 33
(AOC 87-F-0007)
ROSE CHEMICALS SITE**

Dear Steve:

The EPA Site status Report for the Rose
Chemicals Site at Holden, Missouri, is attached.
This reports covers progress during July 1990.

Very truly yours,

Robin J. Robinson
CSI Project Manager

RJR/sjr

Enclosures

cc: Mr. George Hess
U.S.E.P.A.
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Bob Morby
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Kansas City, KS 66101

Mr. Jim Kohanek, Clean Sites, Inc.

PROJECT PROGRESS REPORT NO. 33
(AOC 87-F-0007)

ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR PERIOD JULY 1ST THROUGH JULY 31ST, 1990

HIGHLIGHTS

- o The EPA requested additional modifications to the Feasibility Study (FS) which was submitted on June 29, 1990. A meeting is scheduled at Clean Sites on August 9, 1990 to discuss the required modifications.

PROGRESS REPORT NO. 33

(AOC 87-F-0007)

ROSE CHEMICALS SITE - HOLDEN, MISSOURI

STATUS FOR JULY, 1990

I. RI/FS

- o As reported last month, Burns & McDonnell submitted the revised Feasibility Study to EPA on June 29, 1990. EPA reviewed the document during July and on July 16, 1990 reported additional revisions to the document are required.

The major revisions relate to the discussion of applicable or relevant and appropriate requirements (ARARs). EPA wishes an expanded treatment of ARARs in the following areas: RCRA, 100-Year Flood Plain, and Protection of Wetlands.

EPA would also like a more thorough discussion of the evaluation of each option and suboption against the nine criteria specified in CERCLA Section 121.

II. SCHEDULE

- o The Rose Chair's Committee will meet in Alexandria, Virginia on August 9, 1990. At that meeting, the Chairs will discuss the necessary revisions to the FS. Subsequent to that meeting, a revised schedule for completing the work on the FS will be developed and submitted to EPA. Accompanying that revised schedule will be a request for extension to the schedule for the FS as presented in the RI/FS Work Plan.

III. SITE ACTIVITIES FOR AUGUST

- o None expected.



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Exxon Corporation

September 17, 1990

Mr. Steven E. Kinser
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Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101

**SUBJECT: EPA SITE STATUS REPORT NO. 34
(AOC 87-F-0007)
ROSE CHEMICALS SITE**

Dear Steve:

The EPA Site status Report for the Rose
Chemicals Site at Holden, Missouri, is attached.
This reports covers progress during August, 1990.

Very truly yours,

Robin J. Robinson
CSI Project Manager

RJR/sjr

Enclosures

cc: Mr. George Hess
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Mr. Jim Kohanek, Clean Sites, Inc.

PROJECT PROGRESS REPORT NO. 34
(AOC 87-F-0007)

ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR PERIOD AUGUST 1ST THROUGH AUGUST 31ST, 1990

- Additional modifications were made to the Feasibility Study (FS) at the request of EPA. The final FS was submitted to EPA on September 7, 1990.

PROGRESS REPORT NO. 34
(AOC 87-F-0007)

ROSE CHEMICALS SITE - HOLDEN, MISSOURI

STATUS FOR AUGUST, 1990

I. RI/FS

- A meeting of the Rose Chairs was held at Clean Sites' office on August 8, 1990. At that meeting, the request by EPA to make additional modifications to the FS was discussed and agreed to. During the meeting, a phone conversation was held with Steve Kinser who explained the additional request which primarily came from EPA counsel.

During the rest of August, the required modifications to the FS were made and reviewed by Joe Kwasnik, Harry Walton, Sheldon Zabel and Robin Robinson. The final modifications will be made in early September, at which time the Final FS will be delivered to EPA.

II. SCHEDULE

- At the request of EPA, a revised delivery date for the Final FS was submitted to EPA. In that letter, we requested a formal extension of the schedule to September 14, 1990. EPA has responded, approving the schedule extension.
- During September, EPA will issue the Remedial Investigation (RI) and the FS. EPA then plans to hold a preliminary public meeting to explain those documents and outline the remedial alternatives. Following that public meeting, EPA will issue their Proposed Plan after which there will be a 30-day public comment period.

III. SITE ACTIVITIES FOR SEPTEMBER

- Water in the pit will be pumped through the charcoal adsorption system and discharged.



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October 17, 1990

Mr. Steven E. Kinser
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**SUBJECT: EPA SITE STATUS REPORT NO. 35
(AOC 87-F-0007)
ROSE CHEMICALS SITE**

Dear Steve:

The EPA Site status Report for the Rose Chemicals Site at Holden, Missouri, is attached. This reports covers progress during September, 1990.

Very truly yours,

Robin J. Robinson
CSI Project Manager

RJR/sjr

Enclosures

cc: Mr. George Hess
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PROJECT PROGRESS REPORT NO. 35 (AOC 87-F-0007)

ROSE CHEMICALS SITE, HOLDEN, MO.

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STATUS FOR PERIOD SEPTEMBER 1ST THROUGH SEPTEMBER 30TH, 1990

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● The final Feasibility Study (FS) was submitted to EPA on September 7, 1990.

**PROGRESS REPORT NO. 35
(AOC 87-F-0007)**

ROSE CHEMICALS SITE - HOLDEN, MISSOURI

STATUS FOR SEPTEMBER, 1990

I. RI/FS

- The final changes requested by EPA were made to the FS during late August and early September, 1990. The final FS was submitted to EPA on September 7, 1990.
- During the rest of September, EPA was reviewing the document and holding internal meetings regarding the remedies proposed in the document.
- Addendum #1 to the report on the remedial investigation of the Rose Chemical Site, Holden, Missouri (RI) was drafted by Burns and McDonnell during September. This document reports on the fourth round of ground water sampling which was performed at the Rose Site to provide additional site characterization data. The report describes the sampling, results of the analyses, and the implications of these results with respect to the nature and extent of contamination at the site. The Addendum is currently being reviewed by members of the RI/FS Task Force after which it will be formally submitted to EPA, probably in mid-October.

II. SITE ACTIVITIES FOR OCTOBER

- Water in the pit will be pumped through the charcoal adsorption system and discharged. No other site activities are planned.



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November 15, 1990

Mr. Steven E. Kinser
Regional Project Manager
U.S.E.P.A.
Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101

SUBJECT: EPA SITE STATUS REPORT NO. 36
(AOC 87-F-0007)
ROSE CHEMICALS SITE

Dear Steve:

The EPA Site status Report for the Rose Chemicals Site at Holden, Missouri, is attached. This reports covers progress during October, 1990.

Very truly yours,

Robin J. Robinson
CSI Project Manager

RJR/sjr

Enclosures

cc: Mr. George Hess
U.S.E.P.A.
Region VII
25 Funston Road
Kansas City, KS 66115

Bob Morby
U.S.E.P.A.
Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101

Mr. Jim Kohanek, Clean Sites, Inc.

**PROJECT PROGRESS REPORT NO. 36
(AOC 87-F-0007)**

ROSE CHEMICALS SITE, HOLDEN, MO.

**STATUS FOR PERIOD OCTOBER 1ST THROUGH OCTOBER 31ST,
1990**

HIGHLIGHTS

- The PRP negotiating team met with EPA in Kansas City on October 16, 1990 to discuss additional comments on the Feasibility Study.

**PROGRESS REPORT NO. 36
(AOC 87-F-0007)**

ROSE CHEMICALS SITE - HOLDEN, MISSOURI

STATUS FOR OCTOBER, 1990

I. RI/FS

The EPA completed their review of the Feasibility Study (FS) in early October. A meeting was held in Kansas City on October 16, 1990 to discuss further modifications to the document. The meeting was attended by Bob Morby, Ron King, Steve Kinser, Scott Pemberton and Helen Tinson for EPA; James Cavanaugh, James Pels, and Bob Geller for Missouri DNR; Jay Pruett, Joe Kwasnik, Jan Callison, Sheldon Zabel, Gabe Rodriguez and Robin Robinson. The result of the meeting was that EPA plans to request further modifications to the FS. Basically they are looking for the addition of an option that would be a combination of two others. The components of this option would be 1) removal of soil outside the buildings to a maximum level of 10 ppm and 2) sealing and capping the concrete floors of the two warehouses.

There were a number of other comments of a more detailed nature.

EPA said they would submit their new comments to Clean Sites by October 24, 1990. However, by November 9, 1990, no comments had been received. Consequently, no further changes have been made at this time.

II. SITE ACTIVITIES DURING OCTOBER

- New canisters of charcoal arrived at the site. We are preparing to pump water that has accumulated in the pit through the system.
- An apparent break-in occurred at the site during October, 1990. The fence along the north side of the site has been cut. The evidence indicates that two people tried to go over the fence to get into the property. Apparently one individual was injured. The second person cut the fence in order to get his companion out. There is no evidence that the trespassers tried to get into the warehouses themselves.

III. SITE ACTIVITIES FOR NOVEMBER

- Water in the pit will be pumped through the charcoal adsorption system and discharged. No other site activities are planned.



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Louis Fernandez
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Monsanto Company

December 15, 1990

Mr. Steven E. Kinser
Regional Project Manager
U.S.E.P.A.
Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101

**SUBJECT: EPA SITE STATUS REPORT NO. 37
(AOC 87-F-0007)
ROSE CHEMICALS SITE**

Dear Steve:

The EPA Site status Report for the Rose Chemicals Site at Holden, Missouri, is attached. This reports covers progress during November, 1990.

Very truly yours,

Robin J. Robinson
CSI Project Manager

RJR/sjr

Enclosures

cc: Mr. George Hess
U.S.E.P.A.
Region VII
25 Funston Road
Kansas City, KS 66115

Bob Morby
U.S.E.P.A.
Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101

Mr. Jim Kohanek, Clean Sites, Inc.

**PROJECT PROGRESS REPORT NO. 37
(AOC 87-F-0007)**

ROSE CHEMICALS SITE, HOLDEN, MO.

**STATUS FOR PERIOD NOVEMBER 1ST THROUGH NOVEMBER
30TH, 1990**

HIGHLIGHTS

- The EPA officially accepted the revised Feasibility Study (FS) with two exceptions.
- EPA's letter listed fourteen items of clarification. The letter is to be appended to the FS as a supplement.

**PROGRESS REPORT NO. 37
(AOC 87-F-0007)**

ROSE CHEMICALS SITE - HOLDEN, MISSOURI

STATUS FOR NOVEMBER, 1990

I. RI/FS

Following the PRP negotiating team meeting with EPA on October 16, 1990, EPA had a series of internal meetings addressing the need for further revision of the FS. As a result of those meetings, EPA formally notified Clean Sites in a letter dated December 5, 1990 that the revised FS would be accepted provided two changes were made in the text. The requested changes are in the Executive Summary and Part 5. In each case, the EPA request that we delete the sentence stating that the statutory preference for treatment has been met. The Steering Committee will discuss the requested deletions in a conference call in December, 1990 or early January, 1991.

In addition, there are fourteen changes which EPA points out in the transmittal letter. These changes involve such things as site definition, future use of the site, need for additional groundwater monitoring wells, use of clean fill, past treatment of PCBs at the site, excavation of PCB-contaminated soil, chemical specific and action specific ARARs, volatile organic chemical contamination, use of the term "average concentrations", solvent washing, encapsulation of contaminated material, disposal of contaminated material, the role of EPA's new PCB cleanup guidance, and verification sampling. None of these comments requires modification to the text of the FS since EPA will attach their cover letter as a supplement to the FS.

II. SITE ACTIVITIES

Water in the pit was pumped through the charcoal adsorption system and discharged after the analyses of the water indicated PCB concentrations below detection limit.

III. SCHEDULE

- EPA has informed us that they intend to issue the Proposed Plan during the week of December 17, 1990. The period of comment is expected to extend through January 31, 1991. EPA hopes to hold a town meeting either the first week in January or during the week of January 14, 1991.

IV. SITE ACTIVITIES FOR DECEMBER

No site activities are planned.



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January 15, 1991

Mr. Steven E. Kinser
Regional Project Manager
U.S.E.P.A.
Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101

**SUBJECT: EPA SITE STATUS REPORT NO. 38
(AOC 87-F-0007)
ROSE CHEMICALS SITE**

Dear Steve:

The EPA Site status Report for the Rose Chemicals Site at Holden, Missouri, is attached. This reports covers progress during December, 1990.

Very truly yours,

Robin J. Robinson
CSI Project Manager

RJR/sjr

Enclosures

cc: Mr. George Hess
U.S.E.P.A.
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25 Funston Road
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Mr. Jim Kohanek, Clean Sites, Inc.

**PROJECT PROGRESS REPORT NO. 38
(AOC 87-F-0007)**

ROSE CHEMICALS SITE, HOLDEN, MO.

**STATUS FOR PERIOD DECEMBER 1ST THROUGH DECEMBER 31ST,
1990**

HIGHLIGHTS

- Review of Addendum #1 to the Remedial Investigation (RI) Report was completed. The Addendum covers the fourth round of groundwater sampling at the site and confirms the results found in the third round.

**PROGRESS REPORT NO. 38
(AOC 87-F-0007)**

ROSE CHEMICALS SITE - HOLDEN, MISSOURI

STATUS FOR DECEMBER, 1990

I. RI/FS

Addendum #1 to the RI Report addresses the fourth round of groundwater sampling at the site. This work was done in January through April, 1990 and as reported in Progress Reports 27-30 confirmed the results of the third round of sampling. Minor editorial changes were made during December, 1990. The Addendum will be submitted to EPA early in January, 1991.

The revisions to the Feasibility Study (FS) requested last month by EPA were discussed by the RI/FS Task Force and the Negotiating Committee. A meeting is scheduled for January 7, 1991, with EPA to agree upon modified language for these two sentences.

II. SITE ACTIVITIES

No activities occurred at the site during December, 1990.

III. SCHEDULE

EPA delayed issuing the Proposed Plan until January, 1991. They currently plan to issue that document during the week of January 22, 1991. A town meeting should be held shortly thereafter, probably during the week of January 28, 1991.

IV. SITE ACTIVITIES FOR JANUARY

No site activities are planned.



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February 15, 1991

Mr. Steven E. Kinser
Regional Project Manager
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Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101

**SUBJECT: EPA SITE STATUS REPORT NO. 39
(AOC 87-F-0007)
ROSE CHEMICALS SITE**

Dear Steve:

The EPA Site status Report for the Rose Chemicals Site at Holden, Missouri, is attached. This report covers progress during January, 1991.

Very truly yours,

Robin J. Robinson
CSI Project Manager

RJR/sjr

Enclosures

cc: Mr. George Hess
U.S.E.P.A.
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Kansas City, KS 66115

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Mr. Jim Kohanek, Clean Sites, Inc.

**PROJECT PROGRESS REPORT NO. 39
(AOC 87-F-0007)**

ROSE CHEMICALS SITE, HOLDEN, MO.

**STATUS FOR PERIOD JANUARY 1ST THROUGH JANUARY 31ST,
1991**

- A meeting was held with EPA on January 7, 1991 to convey to the Agency the Rose PRPs' position on several aspects of the alternative cleanup options presented in the Feasibility Study (FS).

**PROGRESS REPORT NO. 39
(AOC 87-F-0007)**

ROSE CHEMICALS SITE - HOLDEN, MISSOURI

STATUS FOR JANUARY, 1991

I. RI/FS

The Rose negotiating committee headed by Jay Pruett, met with EPA on January 7, 1991. In attendance were Jay Pruett, Joe Kwasnik, Sheldon Zabel, Gabe Rodriguez, Robin Robinson, Robert Morby, Ron King, Steve Kinser and Scott Pemberton. The discussion centered around the EPA's position regarding the need to incinerate concrete and soil with PCB concentrations greater than 500 and 100 ppm respectively.

A considerable amount of time was also spent discussing whether or not the Statutory preference for treatment has been satisfied at Rose as a result of the incineration of large quantities of PCBs during the removal phase of the project.

EPA is taking the thoughts of the PRP group under advisement as they prepare the Proposed Plan.

II. SITE ACTIVITIES

There were no planned activities at the site during January, 1991. However, another break in occurred on February 2, 1991. A thief entered the main warehouse and stole approximately 250 feet of electrical cable that provided power to the charcoal adsorption system. The cable has been replaced with the new cable being routed through the rafters to make it harder to get at.

III. SCHEDULE

EPA intends to issue the Proposed Plan sometime in February, 1991. A town meeting, scheduled for February 19, 1991, has been delayed to give EPA more time to address several key issues before publishing the Proposed Plan.

IV. SITE ACTIVITIES FOR FEBRUARY

No site activities are planned.



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March 15, 1991

Mr. Steven E. Kinser
Regional Project Manager
U.S.E.P.A.
Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101

SUBJECT: EPA SITE STATUS REPORT NO. 40
(AOC 87-F-0007)
ROSE CHEMICALS SITE

Dear Steve:

The EPA Site status Report for the Rose Chemicals Site at Holden, Missouri, is attached. This reports covers progress during February, 1991.

Very truly yours,

Robin J. Robinson
CSI Project Manager

RJR/sjr

Enclosures

cc: Mr. George Hess
U.S.E.P.A.
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25 Funston Road
Kansas City, KS 66115

Bob Morby
U.S.E.P.A.
Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101

Mr. Jim Kohanek, Clean Sites, Inc.

**PROJECT PROGRESS REPORT NO. 40
(AOC 87-F-0007)**

ROSE CHEMICALS SITE, HOLDEN, MO.

**STATUS FOR PERIOD FEBRUARY 1ST THROUGH FEBRUARY 28TH,
1991**

HIGHLIGHTS

- No site activities occurred during the month of February.

**PROGRESS REPORT NO. 40
(AOC 87-F-0007)**

ROSE CHEMICALS SITE - HOLDEN, MISSOURI

STATUS FOR FEBRUARY, 1991

I. RI/FS

EPA continued internal discussions of the Proposed Plan during February, 1991. As of the end of the month, the Proposed Plan had not been issued.

II. SITE ACTIVITIES

The electrical cable to the charcoal adsorption system, which was stolen on February 2, 1991, was replaced. The new cable was routed through the rafters to make it more difficult to get at. At the suggestion of the EPA, an alarm system was ordered. The system is designed to alert the authorities in the event of an intruder in the warehouse area.

III. SCHEDULE

It is our understanding that EPA intends to issue the Proposed Plan during March, 1991.

The Rose Steering Committee, along with the Technical and Legal Subcommittees, will meet in New Orleans on March 7 and 8, 1991.

IV. SITE ACTIVITIES FOR MARCH

The burglar alarm system will be installed.



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May 15, 1991

Mr. Steven E. Kinser
Regional Project Manager
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Kansas City, KS 66101

SUBJECT: EPA SITE STATUS REPORT NO. 42
(AOC 87-F-0007)
ROSE CHEMICALS SITE

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Louis Fernandez
Chairman, Retired
Monsanto Company

Dear Steve:

The EPA Site status Report for the Rose Chemicals Site at Holden, Missouri, is attached. This reports covers progress during April, 1991.

Very truly yours,

Robin J. Robinson
CSI Project Manager

RJR/sjr

Enclosures

cc: Mr. George Hess
U.S.E.P.A.
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Bob Morby
U.S.E.P.A.
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Mr. Jim Kohanek, Clean Sites, Inc.

PROJECT PROGRESS REPORT NO. 42
(AOC 87-F-0007)

ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR PERIOD APRIL 1ST THROUGH APRIL 30TH, 1991

- No site activities occurred during the month.

PROGRESS REPORT NO. 42
(AOC 87-F-0007)

ROSE CHEMICALS SITE - HOLDEN, MISSOURI

STATUS FOR APRIL, 1991

I. RI/ES

EPA continued internal discussions of the Proposed Plan during April, 1991. As of the end of the month, the Proposed Plan had not been issued.

II. SITE ACTIVITIES

A check for \$1,500 was written to the Missouri DNR for renewal of the Storm Water Discharge Permit. The permit is being kept in force in case it is needed during Remedial Action Phase of the Work.

A revised bill from EPA was received during April for their oversight costs. The payment was made by wire transfer on April 26, 1991.

Water in the pit was pumped through the charcoal absorption system and discharged to the ponds. Analysis indicated the PCB content was below detection limit (bdl).

III. SCHEDULE

Further progress on the project awaits EPA's issuing the Proposed Plan.

IV. SITE ACTIVITIES FOR MAY

No site activities are expected to occur during this month.



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April 15, 1991

Mr. Steven E. Kinser
Regional Project Manager
U.S.E.P.A.
Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101

SUBJECT: EPA SITE STATUS REPORT NO. 41
(AOC 87-F-0007)
ROSE CHEMICALS SITE

Dear Steve:

The EPA Site status Report for the Rose Chemicals Site at Holden, Missouri, is attached. This reports covers progress during March, 1991.

Very truly yours,

Robin J. Robinson
CSI Project Manager

RJR/sjr

Enclosures

cc: Mr. George Hess
U.S.E.P.A.
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25 Funston Road
Kansas City, KS 66115

Bob Morby
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Mr. Jim Kohanek, Clean Sites, Inc.

**PROJECT PROGRESS REPORT NO. 41
(AOC 87-F-0007)**

ROSE CHEMICALS SITE, HOLDEN, MO.

STATUS FOR PERIOD MARCH 1ST THROUGH MARCH 31ST, 1991

HIGHLIGHTS

- Part of the South Warehouse roof was blown off during a wind storm.

**PROGRESS REPORT NO. 41
(AOC 87-F-0007)**

ROSE CHEMICALS SITE - HOLDEN, MISSOURI

STATUS FOR MARCH, 1991

I. RI/FS

EPA continued internal discussions of the Proposed Plan during March, 1991. As of the end of the month, the Proposed Plan had not been issued.

II. SITE ACTIVITIES

A 75mph wind hit Holden on March 22, 1991. A part of the roof of the South Warehouse was ripped off and fell inside. Several hanging pieces of tin were removed by Jerry Hollingsworth, the Clean Sites site manager, and placed inside the warehouse. No material appears to have left the site.

The burglar alarm was installed at the site.

We received a bill from the Missouri DNR for renewal of a storm water discharge permit. The permit will be kept in force in case it is needed during the remedial action phase of the work.

III. SCHEDULE

Further progress on the project awaits EPA's issuing the Proposed Plan.

IV. SITE ACTIVITIES FOR APRIL

Water in the pit will be pumped through the charcoal system, analyzed, and discharged to the ponds.



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June 15, 1991

Mr. Steven E. Kinser
Regional Project Manager
U.S.E.P.A.
Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101

SUBJECT: EPA SITE STATUS REPORT NO. 432
(AOC 87-F-0007)
ROSE CHEMICALS SITE

Dear Steve:

The EPA Site status Report for the Rose Chemicals Site at Holden, Missouri, is attached. This reports covers progress during May, 1991.

Very truly yours,

Robin J. Robinson
CSI Project Manager

RJR/sjr

Enclosures

cc: Mr. George Hess
U.S.E.P.A.
Region VII
25 Funston Road
Kansas City, KS 66115

Bob Morby
U.S.E.P.A.
Superfund Branch
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Mr. Jim Kohanek, Clean Sites, Inc.

**PROGRESS REPORT NO. 43
(AOC 87-F-0007)**

ROSE CHEMICALS SITE - HOLDEN, MISSOURI

STATUS FOR MAY, 1991

I. RI/FS

EPA continued internal discussions of the Proposed Plan during April, 1991. As of the end of the month, the Proposed Plan had not been issued.

II. SITE ACTIVITIES

No site activities occurred during May.

III. SCHEDULE

Further progress on the project awaits EPA's issuing the Proposed Plan.

We understand, from conversations with Steve Kinser, that the Proposed Plan should be issued sometime in June, 1991.

IV. SITE ACTIVITIES FOR JUNE

No site activities are expected to occur during this month.



August 15, 1991

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Monsanto Company

Mr. Steven E. Kinser
Regional Project Manager
U.S.E.P.A.
Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101

**SUBJECT: EPA SITE STATUS REPORT NO. 45
(AOC 87-F-0007)
ROSE CHEMICALS SITE**

Dear Steve:

The EPA Site status Report for the Rose Chemicals Site at Holden, Missouri, is attached. This report covers progress during July, 1991.

Very truly yours,

Robin J. Robinson
CSI Project Manager

RJR/sjr

Enclosures

cc: Mr. George Hess
U.S.E.P.A.
Region VII
25 Funston Road
Kansas City, KS 66115

Bob Morby
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Mr. Jim Kohanek, Clean Sites, Inc.

**PROGRESS REPORT NO. 45
(AOC 87-F-0007)**

ROSE CHEMICALS SITE - HOLDEN, MISSOURI

STATUS FOR JULY, 1991

HIGHLIGHTS

- EPA held a town meeting in Holden, Missouri on July 11, 1991 to present the Proposed Plan and request public comment. Joe Kwasnik represented the Rose Chemicals Steering Committee at the meeting and commented on the EPA's Proposed Alternative.
- The Rose Chemicals Technical Subcommittee and Steering Committee met in St. Louis, Missouri on July 10 and 11, 1991 to review the Proposed Plan and prepare comments for the Town Meeting.

**PROGRESS REPORT NO. 45
(AOC 87-F-0007)**

ROSE CHEMICALS SITE - HOLDEN, MISSOURI

STATUS FOR JULY, 1991

I. RI/FS

The Rose Chemicals Technical Subcommittee met in St. Louis, Missouri on July 10, 1991 to discuss the EPA's Proposed Plan and to begin developing oral and written comments on that Plan. As reported last month, the Plan calls for Alternative 6 from the Feasibility Study to be implemented with two modifications: (1) soil at the Site with PCB concentrations greater than 100 ppm would be incinerated or treated, and (2) contaminated concrete would be incinerated or treated if concentrations exceed 2,500 ppm.

The Technical Subcommittee and Steering Committee expressed their concern that the Proposed Plan alternative was not justified based upon several factors including the National Contingency Plan's overriding criterion: protection of human health and the environment.

Joe Kwasnik and Robin Robinson attended the town meeting on July 11, 1991. Joe presented comments which had been outlined before the Steering Committee earlier that day.

II. SITE ACTIVITIES

No site activities occurred during July.

III. SCHEDULE

The period for making comments on the Proposed Plan has been extended until August 27, 1991. The Negotiating Committee will meet at Clean Sites on Wednesday, August 7, 1991 to work on written comments to be submitted to EPA.

IV. SITE ACTIVITIES FOR AUGUST

No site activities are expected to occur during this month.



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July 15, 1991

Mr. Steven E. Kinser
Regional Project Manager
U.S.E.P.A.
Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101

**SUBJECT: EPA SITE STATUS REPORT NO. 44
(AOC 87-F-0007)
ROSE CHEMICALS SITE**

Dear Steve:

The EPA Site status Report for the Rose Chemicals Site at Holden, Missouri, is attached. This reports covers progress during June, 1991.

Very truly yours,

Robin J. Robinson
CSI Project Manager

RJR/sjr

Enclosures

cc: Mr. George Hess
U.S.E.P.A.
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25 Funston Road
Kansas City, KS 66115

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Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101

Mr. Jim Kohanek, Clean Sites, Inc.

**PROGRESS REPORT NO. 44
(AOC 87-F-0007)**

ROSE CHEMICALS SITE - HOLDEN, MISSOURI

STATUS FOR JUNE, 1991

I. RI/ES

EPA issued the Proposed Plan on June 20, 1991. The Plan calls for Alternative 6 from the Feasibility Study to be implemented with two modifications. The first is that soils at the site with PCB concentrations greater than 100 ppm would be incinerated or treated to reduce the PCB concentration and the second is that contaminated concrete from the warehouses would be incinerated or treated if concentrations exceed 2,500 ppm. After incineration, the materials would be landfilled.

EPA estimates the cost of the preferred remedy to be 13.6 M\$ and that the incremental cost for the Proposed Plan remedy over Alternative 6 would be 1.2 M\$.

II. SITE ACTIVITIES

No site activities occurred during June.

III. SCHEDULE

A town meeting is scheduled for July 11, 1991 in the city offices in Holden, Missouri at 7:00 p.m. At that meeting, EPA will make a presentation of the selected remedy and will seek comments from the community and the PRPs. Representatives of the Technical Committee and Clean Sites plan to attend that meeting.

In preparation for the meeting, a Technical Committee meeting will be held on July 10 and a Steering Committee meeting will be held on July 11, 1991, both in St. Louis, Missouri.

IV. SITE ACTIVITIES FOR JULY

No site activities are expected to occur during this month.



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September 15, 1991

Mr. Steven E. Kinser
Regional Project Manager
U.S.E.P.A.
Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101

**SUBJECT: EPA SITE STATUS REPORT NO. 46
(AOC 87-F-0007)
ROSE CHEMICALS SITE**

Dear Steve:

The EPA Site status Report for the Rose Chemicals Site at Holden, Missouri, is attached. This reports covers progress during August, 1991.

Very truly yours,

Robin J. Robinson
CSI Project Manager

RJR/sjr

Enclosures

cc: Mr. George Hess
U.S.E.P.A.
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Bob Morby
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Mr. Jim Kohanek, Clean Sites, Inc.

**PROGRESS REPORT NO. 46
(AOC 87-F-0007)**

ROSE CHEMICALS SITE - HOLDEN, MISSOURI

STATUS FOR AUGUST, 1991

HIGHLIGHTS

- The Rose Chemicals' Negotiating Committee met at Clean Sites on August 7, 1991, to draft comments on EPA's Proposed Plan. The comments were subsequently reviewed by the Steering Committee and submitted to EPA on August 27, 1991.

**PROGRESS REPORT NO. 46
(AOC 87-F-0007)**

ROSE CHEMICALS SITE - HOLDEN, MISSOURI

STATUS FOR AUGUST, 1991

I. RI/ES

Draft comments on the Proposed Plan had been prepared by Sheldon Zabel and Gabe Rodriguez of Schiff Hardin and Waite. The Committee reviewed and modified the comments.

Schiff Hardin mailed a revised version of the comments to members of the Steering Committee who responded with additional suggestions. The final document was signed by Jay Pruett, Chairman of the Negotiating Committee, and submitted to EPA on August 27, 1991.

A comment letter was also submitted by Mayor Francis L. Brillhart on behalf of the Holden City Counsel. A copy of that letter is attached.

The next step is for EPA to prepare a responsiveness summary which will respond to each formal comment. Following that, EPA will issue their Record of Decision for the Site.

II. SITE ACTIVITIES

No site activities occurred during August.

III. SCHEDULE

The next step in the process will be the negotiation of a Consent Decree between the Steering Committee and EPA. No firm schedule can be established for this activity.

IV. SITE ACTIVITIES FOR AUGUST

No site activities are expected to occur during this month.



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October 16, 1991

Mr. Steven E. Kinser
Regional Project Manager
U.S.E.P.A.
Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101

SUBJECT: EPA SITE STATUS REPORT NO. 47
(AOC 87-F-0007)
ROSE CHEMICALS SITE

Dear Steve:

The EPA Site status Report for the Rose Chemicals Site at Holden, Missouri, is attached. This reports covers progress during September, 1991.

Very truly yours,

Robin J. Robinson
CSI Project Manager

RJR/sjr

Enclosures

cc: Mr. George Hess
U.S.E.P.A.
Region VII
25 Funston Road
Kansas City, KS 66115

Bob Morby
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Mr. Jim Kohanek, Clean Sites, Inc.

PROGRESS REPORT NO. 47
(AOC 87-F-0007)

ROSE CHEMICALS SITE - HOLDEN, MISSOURI

STATUS FOR SEPTEMBER, 1991

I. RI/FS

By the end of the month, EPA had not issued their Record of Decision. Steve Kinser said the draft is currently being reviewed internally and by MDNR.

II. SITE ACTIVITIES

No site activities occurred during September.

III. SCHEDULE

Relatively small quantities of water from the pit were run through the charcoal adsorption system and discharged to the on-site ponds during September. EPA hopes to issue the ROD during October. Negotiation of a consent Decree should begin shortly thereafter.

IV. SITE ACTIVITIES FOR OCTOBER

No site activities are expected to occur during this month.



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November 19, 1991

Mr. Steven E. Kinser
Regional Project Manager
U.S.E.P.A.
Superfund Branch
726 Minnesota Avenue
Kansas City, KS 66101

**SUBJECT: EPA SITE STATUS REPORT NO. 48
(AOC 87-F-0007)
ROSE CHEMICALS SITE**

Dear Steve:

The EPA Site status Report for the Rose Chemicals Site at Holden, Missouri, is attached. This report covers progress during October, 1991.

Very truly yours,

Robin J. Robinson
CSI Project Manager

RJR/sjr

Enclosures

cc: Mr. George Hess
U.S.E.P.A.
Region VII
25 Funston Road
Kansas City, KS 66115

Bob Morby
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Superfund Branch
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Kansas City, KS 66101

Mr. Jim Kohanek, Clean Sites, Inc.

PROGRESS REPORT NO. 48
(AOC 87-F-0007)

ROSE CHEMICALS SITE - HOLDEN, MISSOURI

STATUS FOR OCTOBER, 1991

I. RI/FS

By the end of the month, EPA had not issued their Record of Decision.

II. SITE ACTIVITIES

No site activities occurred during October.

III. SCHEDULE

Next steps in the schedule depend on issuance of the ROD.

IV. SITE ACTIVITIES FOR NOVEMBER

No site activities are expected to occur during this month.